4. OBJECTIVE AND SCOPE

The objective of the revised SSG-16 Safety Guide is to update guidance on establishing the safety infrastructure for a nuclear power programme taking into account the lessons learned from the analysis of the accident at Fukushima Daiichi NPP. The intention is to reflect insights from the revision of the relevant IAEA Safety Requirements, the reports of International Expert's Meetings, the IAEA Fukushima Comprehensive Report and other international analysis of the accident. The revision will also include other required changes that have been noted during the utilization of the safety guide since its publication.

There is no intention to change the structure and approach adopted in SSG-16; however this revision has taken into consideration the changes introduced in the IAEA Nuclear Energy Series No. NG-G-3.1 (Rev. 2), "Milestones in the Development of a National Infrastructure for Nuclear Power."

Comment Summary

Total Comments:	227
Comments accepted:	126
Comments accepted with Modification:	33
Comments Rejected:	68

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
FORATOM/ ENISS									
FORATOM/ ENISS	1	P. 9 §1.22; P. 12 fig. 4 (top part)	SCOPE	Figure to be removed	The top of figure 4 originally found in the Milestones document NG-G-3.1 was removed from the revised version. This is because it was argued that preparatory work for establishing the regulator and the future owner operator should begin before Milestone 1. As the figure no longer exists, it should also be removed from DS486.			Yes	The figure is indicative and noted that is to be used with flexibility. It needs however to be updated
FORATOM/ ENISS	2	P.11 figure 3	SCOPE	Ready to invite bids / negotiate a contract	Page 11 (and throughout the document): "ready to invite bids" should read "ready to invite bids / negotiate a contract" as explained on p.9 §1.21 in order to reflect the revisions of the No. NG-G-3.1 (Rev. 1). This change takes into account that invitations to bid are neither systematic nor a recommendation of any sort. In reality, there are a number of examples where new nuclear is achieved through a bilateral contract.	Yes			
FORATOM/ ENISS	3	Page 16 §2.8 ; P. 71 §2.185; p. 100 §3.6; p.103 action 153	ACTIONS 1– 10: NATIONAL POLICY AND STRATEGY FOR SAFETY, <i>General</i> ;	a bidding process or negotiate a contract	See comment nº 2	Yes			

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			ACTIONS 85– 98: HUMAN RESOURCES DEVELOPME NT, Phase 2; ACTIONS 146–159: OPERATING ORGANIZATI ON, Phase 1; ACTIONS 146–159: OPERATING ORGANIZATI ON, Phase 2						
FORATOM/ ENISS	4	P. 62: figure 6	ACTIONS 72– 84: LEADERSHIP AND MANAGEME NT FOR SAFETY, General	Figure 6 to be removed	Figure 6 should be removed as it has now been removed from No. NG-G-3.1 (Rev. 1).			Yes	The figure is indicative and noted that is to be used with flexibility. It needs however to be updated

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FORATOM/ ENISS	5	P.100 & p. 142 action 146	ACTIONS 146–159: OPERATING ORGANIZATI ON, Phase 1; ACTIONS 72– 84: LEADERSHIP AND MANAGEME NT FOR SAFETY; Appendix OVERVIEW OF ACTIONS TO BE TAKEN IN EACH PHASE FOR THE ESTABLISHM ENT OF SAFETY INFRASTRUC TURE	Reference to be added to:Action 146. If the operating organization has already been established or identified in Phase 1 (which is not the scenario developed in this Safety Guide in which the operating organization is established at the beginning of Phase 2) it should be involved together with the government in activities for development of the safety infrastructure from the beginning.	In some reports, this is considered the best case scenario. At the very least a reference to the significant preparatory work that is necessary before the establishment of the regulator and operating organization at the beginning of phase 2 should be included.			Yes	No need to repeat here. Sufficient details related to establishing of the RB and OO are in the safety guide

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FORATOM/	6	p.103 action	ACTIONS	in the bid	See comment nº 2			Yes	
ENISS		154; P. 122	146–159:	specifications or					
		§3.62	OPERATING	<u>contract</u>					
		P. 106 §3.19;	ORGANIZATI	evaluation of bids					
		p.124 §3.68	ON, Phase 2;	<u>or contract</u>					
			ACTIONS	negotiations					
			170–184:						
			DESIGN						
			SAFETY;						
			Phase 2;						
			ACTIONS						
			146–159:						
			OPERATING						
			ORGANIZATI						
			ON, Phase 3;						
			ACTIONS						
			170–184:						
			DESIGN						
			SAFETY,						
	_		Phase 3						
FORATOM/	/	P. 103 action	ACTIONS	Ine operating	A "suitable" working relationship. We are			Yes	
ENISS		152; P: 153	146-159:	organization should	not sure what "suitable" means in this				
		action 187; p.	OPERATING	establish a suitable	context. "Constructive" might be better.				
		157 933	ORGANIZATI	<u>constructive</u>					
			UN, Phase 2;	working relationship					
			.Appenaix	with the regulatory					
				body and with					
				relevant national					
				and international					
	1		I O BE TAKEN	organizations,					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
			IN EACH PHASE FOR THE ESTABLISHM ENT OF SAFETY INFRASTRUC TURE Phase 3	consistent with governmental policy					
FORATOM/ ENISS	8	P. 125 action 187:	ACTIONS 185–-188: PREPARATIO N FOR COMMISSIO NING, Phase 3	The operating organization should establish <u>acquire in-</u> <u>depth knowledge of</u> <u>the reactor it is</u> <u>going to be</u> <u>operating. This can</u> <u>be achieved partly</u> <u>by being on-site</u> <u>during the</u> <u>construction phase</u> <u>in particular during</u> <u>the erection of the</u> <u>reactor building.</u> Mechanisms <u>also</u> <u>need to be set up</u> for the transfer of responsibilities for safety with the constructor at the end of Phase 3 <u>by</u>	ENISS Members' experience is that, for safety reasons it is very important for the operating teams to be full knowledgeable about the reactor they will be operating, and to achieve this, our operating teams are present on the construction site early on. DS486 totally ignores this practice. In addition, the current wording is ambiguous.		Yes		The action deals with transfer of responsibilities. The importance of involvement on site activities is reflected in paras. 3.78-82. It has been reinforced in para. 79

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				<u>the time fuel is on</u> <u>site.</u>					
FORATOM/ ENISS	9	P. 127 §3.82 :	ACTIONS 185–-188: PREPARATIO N FOR COMMISSIO NING, Phase 3	Even if commissioning activities are performed by the supplier or other groups, the operating organization should make the necessary arrangements to participate, review and approve these activities at all stages, since	The way this paragraph is written sounds as if the operating organization has a somewhat secondary role during testing and commissioning, in support of the vendor and other contractors. It is the operating organization (licensee) that has the responsibility of testing and commissioning (hand-in-hand with the vendor and other contractors of course) because it is ultimately responsible for safety.			Yes	The role and responsibility for safety of the operating organization are stressed in 3.82
FORATOM/ ENISS	10	p. 154 §165, §174	Appendix OVERVIEW OF ACTIONS TO BE TAKEN IN EACH PHASE FOR THE	<u>bid specifications</u> or negotiate contract	See comment nº 2	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
			ESTABLISHM ENT OF SAFETY INFRASTRUC TURE						
Finland									
Finland	1	General		The updated safety guide gives clear instructions for the establishment of the inrfastrcuture and it is well integrated to the current and future structure of the IAEA safety standards.		Yes			
Finland	2	General		Updated versions of several essential IAEA safety standards have been such as GSR Part 1, GSR Paty 4, NS-R-3, SSR-2/1 and SSR-2/2 have been published in 2016. The references of this documet should	References 5, 17, 31, 33 and 41 the publishing year should be updated to (2016).	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				be updated accordingly.					
Finland	3	2.92	ACTIONS 39– 47: TRANSPAREN CY AND OPENNESS, Phase 1	Principle 4 of the IAEA Fudnamental Safety Principles [1], on Justification iof facilkities and activities, states that "Facilities and activities that give rise to radiation risks must yield an overall benefit." A decision to launch a nuclear power progtamme requires a broad acceptance in society that such a programme is justified. The government should establish a clear decision making process to justify a nuclear power programme, and this process should	Clarity, add process In line with the para. 2.93 The public should be involved in the process. However the decisions are made by government bodies or other public bodies.	Yes			

Country I	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
Finland 4	4	2.109	ACTIONS 48– 60: FUNDING AND FINANCING, Phase 1	be communciated to the interested parties. Involving the public in the early stages of decision making process regarding nuclear power should be prioritized. Financial aspects should also be considered for basic education and training in subjects relevant to nuclear safety, for research that support the development of the national knowledge base on safe use of nuclear energy, and for nuclear regulation. A systematic approach to traiing is highly encouraged as the structured training	To gain moire flexibility it would be better to widen the desription of the research topics.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				nuclear power plants.					
Finland	5	2.126	ACTIONS 61– 71: EXTERNAL SUPPORT ORGANIZATI ONS AND CONTRACTO RS, General	External experts or contractor personnel should <u>be</u> <u>trained and</u> <u>qualified</u> for the task to be performed. It should be the responsibility of the organizations obtaining external support to ensure that saftey related activities are performed by persoinnel with proven skills and competence. For instance, documented assurance that contractor personnel have the necessary	Delete systems at the end of the paragraph. The systematic approach to training is important. This comprises also the training system in an organization.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Finland	6	2.145	ACTIONS 61– 71: EXTERNAL SUPPORT ORGANIZATI ONS AND CONTRACTO RS, Phase 3	qualifications could be requested prior to their involvement in safety related work. This should be assessed, tracked and evaluated through the organization's systematic approach to training system. External personnel providing a service or providing advice to the operating organization cannoy have direct authority over plant personnel, although they may be respoinsible for the quality of the service or advice provided. As the operating organization retains the prime resposnibility for safety of the plant,	with para. 2.126. The systematic appraoch to training is important. This comprises also the training system in an organization	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				it should always					
				for making					
				decsilons					
				Knowledgeble and					
				skilled personnel of					
				the operating					
				organization should					
				be clearly identfiied					
				and should be					
				assigned to the					
				supervision of					
				contractors or					
				temoorary support					
				staff. The specific					
				training needs of					
				the contractors for					
				organization should					
				be assessed					
				tracked and					
				evaluated throuveh					
				a systemtic					
				appraoch to the					
				training system.					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Finland	7	2.195	ACTIONS 99– 104: RESEARCH FOR SAFETY AND REGULATORY PURPOSES, General	Beyond the technical core ateas, attention should be given to aspects relating to safety related researech on organizations, human factors and their combinations.	Clarity, add safety related There is no need to limit the research topic to management systems and human factors. The overall spectrum of organizationla and human research should be presented.		Yes		Only safety related added. Management systems includes all the rest
Finland	8	2.197	ACTIONS 99– 104: RESEARCH FOR SAFETY AND REGULATORY PURPOSES, Phase 1	National research activities should be considered and initiated as early as possible when considering launching a nuclear power programme. The areas if science and technology in which research and developmenmt are of vital importance for every State with a nuclear power plant in operation include reactor physics, thermal hydraulics, material sciences, strength	The test should be in line wuth SSR-2/1 definitions of the accident condictions. The core competences are needed. However there should be research also on the other topic. The columes are may be very different.		Yes		may instead of should is more appropriate

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				analysis and probabilistic safety assessment. Examples of other areas in which research <i>should</i> be considered are fire safety, human performance, seismic analyses, consequence analysis <i>for design</i> <i>extensionk coditions</i> <i>and more severe</i> accidents and management of organizations.					
Finland	9	2.200	ACTIONS 99– 104: RESEARCH FOR SAFETY AND REGULATORY PURPOSES, Phase 2	The national knoweldge base should be strengthende by mean of research groups established in vital areas of safety. These groups should participate in international networks in their respective areas	Add; other parts of the lifecycle of the NPP, Construction, commissioning, decommissioning, final disposal and closure	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				and some group					
				member should be					
				temporarily					
				assigned to on the					
				job training in					
				research					
				organization i other					
				States. The research					
				in viatl areas is					
				aimed at creating an					
				independet					
				knowledge base					
				within the State,					
				which will be					
				necessary to					
				support the					
				contracting,					
				construction and					
				licensing process,					
				and later to support					
				commissioning and					
				safety plant					
				operation and					
				regulatory oversight					
				of safety as well as					
				finally the					
				decommissioning,					
				final disposal and					
				close.					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Finland	10	2.203	ACTIONS 99– 104: RESEARCH FOR SAFETY AND REGULATORY PURPOSES, Phase 3	Arrangements to maintain close contacts with academic research and educational establishments should be ensured. Such arranegements could include participation in conducting specialized training and confirmatpry research projects. A nuclear power progarmme requires a pool of highly skilled, <i>inspired and</i> <i>expertise,</i> which can only be maintained through an actyive national commitment to education and research on safety.	The importance of experience should be emphasized. The innovativeness can be misinterpreted.			Yes	The intention here is to stress research

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Finland	11	2.251	ACTIONS 122–132: SAFETY OF RADIOACTIV E WASTE MANAGEME NT, SPENT FUEL MANAGEME NT AND DECOMMISSI ONING, Phase 1	Detailed regulations governing the back end of the nuclear fuel cycle are not necessary by the end of Phase 2, but work should be started to establish the policy and regulations governing such areas as the transport and storage of radioactive waste and spent fuel	Storage of spent fuel should be added.	Yes			
Finland	12	2.253	ACTIONS 122–132: SAFETY OF RADIOACTIV E WASTE MANAGEME NT, SPENT FUEL MANAGEME NT AND DECOMMISSI ONING, Phase 3	The processing facilities for low level and intermediate level radiocative waste should be incorporated as necessary into the nuclear power plant. It should be ensured that arranegemets for reduction of the volume of waste	Storage of spent fuel should be added.			yes	The interin storage facility can be constructed later

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				and arrangements for the packaging of waste are in accordance with the radiocative waste management strategy. <i>The</i> <i>interim storage</i> <i>facility for spent fuel</i> <i>should be available</i> . The facilities should be fully operational at the time of startup of the first					
Finland	13	3.52	ACTIONS 160–169: SITE SURVEY AND SITE EVALUATION , Phase 3	Activities for radiological environmental impact assessment or environmental monitoring are addressed in paras 2.202-2.214 on raditaion protection.	Environmental Impact <i>Assessment.</i> EIA	Yes			
Finland	14	3.67 3.102 3.104	ACTIONS 193–197: INTERFACES WITH NUCLEAR	Comment - good: "These interfaces should be considered in such a way that the	Very good to brig up the matter of a balanced appraoch. Also reference [56] is very useful in 3.102 and emphasis on coordination in 3.104.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
			SECURITY, General	impacts of safety on security and the impacts of security on safety are taken into account from the design stage onwards and an appropriate balance					
Finland	15	3.106	ACTIONS 193–197: INTERFACES WITH NUCLEAR SECURITY, Phase 1	Add: "A safety cultyure and a nuclear security culkture that givern the attitudes and beahviour of individuals should be developed and <u>fostered. The</u> <u>management</u> <u>system should</u> <u>support strong</u> <u>safety cultyure and</u> <u>security culture.</u>	For clarity.		Yes		The existing sentence with the correction introduced is sufficient.
Finland	16	3.108	ACTIONS 193–197: INTERFACES WITH NUCLEAR SECURITY, Phase 2	Consider adding: "Relevant strcutures, systems and components as well as processes and procedures should be examined	For completeness.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				with regard to both nuclear security and safety aspects so as to ensure that an optimal balance is achieved.					
Germany									
Germany									
Germany	1	1.3	1. Introduction Background	A considerable period of time is necessary to acquire the necessary competences and evolve a strong safety culture before construction and operating a nuclear power plant.	Safety culture cannot be acquired. It is an atti-tude of all people in-volved in nuclear tech-nology and has to be developed / evolved from the beginning of the decision to start a nuclear power pro- gramme. In contrast, competence can be ac-quired by e.g. external contacts, workshops, training courses, etc.		Yes		to promote a strong safety culture
Germany	2	1.10	1. Introduction Background	The actions set out in this Safety Guide are not reformulations of safety requirements; they provide recommendations, expressed as	In general safety guides are written in should form in contrast to "shall" statements in safety requirements. This is usually ex-pressed in an editorial note at the beginning of each safety guide. There is no need to explain this here explicitly again.			Yes	Para 1.10 was specifically requested by MS in the approved SSG 16 because of the special character of this safety guide. The intention of the para is to provide clarity that the implementation of

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				'should' statements, on when to im- plement the relevant requirements. The Safety Guide does not diminish the application of, or provide a syn-opsis of or a substitute for, the IAEA Safety Fundamentals and Safety Requirements publications and the associated Safety Guides.					the actions proposed in this safety guide is not sufficient to ensure compliance with the relevant safety requirements mmentioned in this guide.
Germany	3	1.14	1. Introduction Background	Any other relevant organizations, as well as the news media and the pub- lic, may also use this Safety Guide for assurance that the State has es- tablished the safety infrastructure necessary for commencing the con-struction of a	According to 1.12 "rel-evant organizations" encompasses all organi- zations involved in the process of establishing the required infrastruc-ture. Although the pub-lic information is of great importance, news media and public are not part of the so called "relevant organiza-tions". There is no need to mention these two groups here, because this guide is primarily addressing those parties playing a contributing role in establishing the infrastructure.			Yes	The para was included in the approved original version and outside the scope of this review

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
				nuclear power plant.					
Germany	4	1.16	Objective	The objective of this Safety Guide is to provide guidance on the estab-lishment of a framework for safety in accordance with the IAEA safety standards for States deciding on and preparing to embark on a nuclear power programme. In this regard, it proposes 197 safety related actions to be taken in the first three phases of the development of the nuclear power programme, to	We propose to delete the last sentence and amend the last sentence in para. 1.19 (see our proposal there).		Yes		editorial

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				achieve the foundation for a high level of safety throughout the entire lifetime of the nuclear power plant, including safety in the associated management of radioactive waste and spent fuel, and safety in decommissioning.					
Germany	5	1.17	Objective	It is intended for use as guidance for self-assessment by all organizations involved in the development of a safety infrastructure.	Why emphasizing the self-assessment? First, the guide is a guidance assisting states embark-ing in nuclear energy in establishing the nuclear infrastructure. Second-ly, it can be used for a self- assessment of the current situation in the country, but the guide is not a self- assessment tool.			Yes	MS have been extensively using this safety guide as a reference for conducting self assessment
Germany	6	1.19	Scope	The scope of this Safety Guide co-vers all the relevant IAEA safety requirements to be incorporated into an effective safety infrastructure for the first three	Combined with last sentence of 1.16 to avoid doubling of in-formation (see also our comment on 1.16).	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Acceptea, but modified	Rejected	Reason for modification/ rejection
				phases of a nuclear power programme. The recommen- dations are presented for ease of use in the form of 197 actions. <u>to</u> <u>achieve a high level</u> <u>of safety</u> <u>throughout the</u> <u>entire lifetime of</u> <u>the nuclear power</u> <u>plant, including</u> <u>safety in the</u> <u>associated</u> <u>management of</u> <u>radioactive waste</u> <u>and spent fuel, and</u> <u>safety in</u> <u>decommissioning</u>					
Germany	7	2.1	ACTIONS 1– 10: NATIONAL POLICY AND STRATEGY FOR SAFETY, General	Whereas the reasons for a country to set up a nuclear power programme, authorities responsible for nuclear safety should be defined early in the process.	The decision to embark in nuclear power is usually based on aspects different from safety. Typically there are economic or political reasons for a country to start with nuclear power. Thus, it is important that nuclear safety shall play a role already in an early phase and that the actors in nuclear safety and in promoting nuclear energy should be independent of each user. For this reason, we would			Yes	Principle 2 of the fundamental safety principles (2.53) establishes the independence of the RB. The independence of organizations promoting and regulating nuclear power is covered in several parts of the

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				Organizations responsible for nuclear safety should be inde- pendent and should not be unduly influenced by those organizations in charge of promoting nuclear energy.	propose either an amendment of 2.1 or an additional paragraph.				safety guide (eg.2.65, 2.98)
Germany	8	2.7	ACTIONS 1– 10: NATIONAL POLICY AND STRATEGY FOR SAFETY, <i>General</i>	The implementation of safety improvements cannot detract NPP operators and regulatory bodies from the day to day work of ensuring that existing safety requirements are met.	It is proposed to delete 2.7. This guide focusses on the establishment of a safety infrastructure. Identifying further im- provements of the plant is a typical task during operation, i.e. in a phase after phase 3 of this guide. Furthermore, this para-graph is seen in contra-diction to the idea of continuous improve-ment as promulgated in the Vienna Declaration. There it is stated that "Comprehensive and systematic safety as- sessments are to be carried out periodically and regularly for exist-ing installations throughout their lifetime in order to identify safety improvements that are oriented to meet the above objective. Reasonably practicable or achievable safety improvements are to be implemented in a timely manner."				

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	9	2.10 2nd bullet point	ACTIONS 1– 10: NATIONAL POLICY AND STRATEGY FOR SAFETY, <i>Phase 1</i>	The national position should reflect an understanding of the principles expressed in the IAEA's Fundamental Safety Principles [1], in particular Principle 4: Justification of facilities and activities, which states that "Facilities and activities that give rise to radiation risks must yield an overall benefit". Therefore, a full and proper evaluation should be undertaken before deciding to introduce a nuclear power programme in the State. At this first stage, the assessment of the balance between	It is important, that the balance between risk and benefit on a solely technical background is not sufficient. The ben-efit has to be seen by the risk accepted by the society. Even if the technology risk is neg- ligible, introduction of a new technology (like nuclear power) will not be accepted by the soci-ety. This is a prime task of the national regula-tors and governments.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				the societally accepted risks and benefits may be of a general nature.					
Germany	10	2.12	ACTIONS 1– 10: NATIONAL POLICY AND STRATEGY FOR SAFETY, <i>Phase 1</i>	"The government should also take into account: – The need for and provision for a vigorous competence building programme and the associated human and financial resources (see also paras 2.173– 2.1912.189 on human resources development and); – The provisions and framework for research and	Wrong paragraphs are referred to in several bullets.		Yes		Reference to specific paras deleted

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
				development (see					
				also paras 2.190–					
				2.201 2.192-2.203					
				safety and					
				regulatory					
				purposes):					
				– The need for and					
				provision for spent					
				fuel man-agement					
				and radioactive					
				waste management,					
				including disposal of					
				radioactive waste					
				(see also paras					
				2.236-2.252 2.238-					
				2.254 on salety of					
				management spent					
				fuel management					
				and					
				decommissioning');					
				"					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany		2.14	ACTIONS 1– 10: NATIONAL POLICY AND STRATEGY FOR SAFETY, <i>Phase 1</i>	4th sentence: "For a nuclear power plant project, such a report is very broad and the radiological environmental impact analysis assessment is only a part of the environmental impact assessment." Penultimate sentence: "The radiological environmental impact analysis assessment (which in most States constitutes one section of the environmental impact assessment) is further addressed in paras 2.190– 2.201 2.204–2.216 on radiation protection and	Harmonization of ter-minology and its usage in the Safety Standards Series publications is strongly recommended. In both the Draft Safety Guides DS427 (revision of NS-G-3.2) and DS442 (revision of WS-G-2.3), the term 'radiological environ-mental impact assess-ment' is consistently used. This term has also been incorporated into the IAEA Safety Glos- sary (Draft 2016 Revi-sion), available at http://www- ns.iaea.org/downloads/standards/glossar y/iaea-safety-glossary-draft-2016.pdf. Wrong paragraphs are referred to in the penul-timate sentence.		Yes		Yes, corrected paragraph numbers. The change regarding the radiological environmental impact assessment could be confusing in this context.

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				paras 3.26–3.53 3.25–3.52 on site survey and site evaluation."					
Germany	12	2.15		Before making a knowledgeable decision regarding the introduction of a nuclear power programme, the government should ensure that the expected environmental impact is thoroughly understood, and that an adequate assessment of the	The impact of a nuclear power programme is much broader than only the environmental im-pact. Especially the necessary long term commitments regarding financial and human resources need to be taken into account. The environmental impact is typically assessed plant specific and is consid-ered in the licensing procedure.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				State's safety infrastructure and needs has been conducted.					
Germany	13	2.22	ACTIONS 11– 19: GLOBAL NUCLEAR SAFETY REGIME, Phase 1	2.22 States embarking on a nuclear power programme should cooperate particularly with those States that may be directly impacted by an emergency (i.e. States with territories within emergency planning zones and distances [26]) towards ensuring exchange of information relevant to <u>emergency</u> <u>preparedness and</u> <u>response</u> EPR in relation to the	For clarification. The abbreviation EPR is not used or explained throughout the guide.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	14	2.24	ACTIONS 11– 19: GLOBAL NUCLEAR SAFETY	nuclear power programme. Such a coordination and cooperation should be done on all levels from local authorities and response organizations to national authorities and response organizations including regulatory body, as necessary. 4th bullet: "International peer reviews of safety levels that aim for	Harmonization of ter-minology throughout this Safety Guide is recommended. In nu-merous other paragraphs of this document, solely the				
			REGIME, Phase 1	mutual learning by participating Member States;"	term 'States' is used.				
Germany	15	Action 15	ACTIONS 11– 19: GLOBAL NUCLEAR SAFETY REGIME, Phase 2	The State should become a party to the relevant international conven-tions, as identified in Phase 1., and should be actively engaged in the related peer	Based on the experi-ences of the last CNS review meetings, not all contracting parties take part in the review pro-cesses to share experi-ences within the com- munity. This recom-mendation is further substantiated in 2.28 and 2.29 and especially 2.30.			Yes	engagement in the review process is an obligation of all CPs. The weak participation isan issue being addressed in the frame of the conventions'meetgs

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				review processes.					
Germany	16	2.30	ACTIONS 11– 19: GLOBAL NUCLEAR SAFETY REGIME, <i>Phase 3</i>	Move directly after 2.29.	From our point of view, these activities should already start in phase 2. Many contracting par-ties of the relevant in- ternational conventions are already taking part in the review process even no bidding process has been started yet.			Yes	The obligation to participate in the review meetings starts when the country becomes a contracting party independent of the phase and even if it is not planning a NPP. Here it stresses the case of embarking countries action 15 phase 2

Country No. Para/Line No. Ref. to SSG- 16 chapter Proposed new text Reaso	son Reason for Brt of B
Germany 17 2.41 ACTIONS 20- 23: LEGAL "	e referred to in Yes

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	18	2.58	ACTIONS 24– 38: REGULATORY FRAMEWOR K, General	"Development of human resources of the regu-latory body and the de- velopment of its man-agement system are addressed in paras 2.173–2.1912.189 on human resources de-velopment and paras 2.152–2.172 on leadership and management for safe-ty, respectively."	Wrong paragraph is referred to.	Yes			
Germany	19	2.62	ACTIONS 24– 38: REGULATORY FRAMEWOR K, Phase 1	The development of the regulatory framework involves <u>a strategic decision</u> <u>between a</u> maintaining a balance between prescriptive approaches and more flexible goal setting approaches. This balance might depend upon the State's legal system	It is a little bit too easy to recommend balanc-ing between a prescrip-tive and goal oriented approach of the regula-tory framework. There are a lot of pros and cons for each of the both approaches (see also discussion in 2.70). In addition, this is dis-cussed in more detail in 2.70. Consequently, in phase 1 the balancing between prescriptive and goal setting ap-proach does not make sense, if the advantages and disadvantages of both approaches should be considered in phase 2.			Yes	In phase 1 it is simply a reference for awareness. This is why the atual discussion is in phase 2
Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
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				and regulatory					
				approach. Since the					
				approach chosen					
				will have a major					
				influence on the					
				resources needed					
				by the regulatory					
				body, the persons					
				expected to be in					
				charge of the					
				regulatory body					
				should start					
				learning and					
				considering various					
				regulatory					
				approaches in Phase					
				1. A strategy is					
				envisioned to					
				determine which					
				regulatory approach					
				will be chosen.					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	20	2.71	ACTIONS 24– 38: REGULATORY FRAMEWOR K, Phase 2	Besides the general alternatives just described, the approaches in differ-ent States vary with respect to the scope and depth of safety assess- ment and inspection. The scope of issues that are under regulatory con-trol may include all structures, sys-tems and components classified as safety relevant or may be limited to the most safety relevant parts only. The targets of the comprehensive and systematic regulatory control and inspections are specified in a deterministic manner, on the basis of a safety	As safety objectives are formulated by the gov-ernment / regulatory body, during a licensing procedure the regulato-ry body has to ensure that the proposed de-sign meets the safety expectation of the State. A restriction to assess the management system and the performance of the operating organization and their suppliers cannot be considered as an effective review pro-cess. Independent calcula-tions (called audit cal-culations in GS-G-1.2 para 3.38 ff.) are rec-ommended in GS-G-1.2. The advantage is, that audit calculations improves the under-standing of the behav-iour of the plant in dif-ferent plant states. But it requires a lot of hu-man resources and the availability of inde- pendent computer codes. Inspections are seen mandatory, because it is the only way the regula-tory can verify that a NPP complies with legislation, regulation and license conditions. Furthermore, inspec-tions are required in GSR Part 1 - Require-ment 27.		Yes		The practices in different States is properly included. No need to add here new sentence about importance of inspections.

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				classification, or					
				they can be chosen					
				on the basis of a					
				probabilistic					
				assessment of risks.					
				As to the depth of					
				the review, in some					
				States the					
				regulatory body					
				puts the main em-					
				phasis on the					
				assessment and					
				audit-ing of the					
				management					
				system and the					
				operations of the					
				operating or-					
				ganizations and					
				their suppliers. In					
				other <u>some</u> States					
				the regulatory body					
				prefers to make					
				comprehensive					
				independent					
				analyses <u>(audit</u>					
				calcula-tions) and					
				inspections of its					
				own. <u>Inspections</u>					
				offec tive teel to					
				effec-tive tool to					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				verify that the plant will be constructed, commissioned, op- erated and decommissioned accord-ing to the national legislation and regulations as well as the license conditions.					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	21	2.72	ACTIONS 24– 38: REGULATORY FRAMEWOR K, Phase 2	Throughout Phase 2, the regulatory body should have a firm strategy for prioritizing the development of regulations. Regulations governing management of safety, site evalua- tion, design (including aspects of later decommissioning), construction and manufacturing should be prepared so as to be taken into ac-count in the bidding process.	Already in the design phase the later decom-missioning need to be considered, even if this activity will start 40 to 60 years and more after a decision for starting a nuclear power pro-gramme was made. See also SSR 2/1, Require-ment 6 and 12.	Yes			
Germany	22	2.80	ACTIONS 24– 38: REGULATORY FRAMEWOR K, Phase 3	In many cases, it is helpful <u>in an early</u> <u>phase</u> to accept the use of technical standards of the vendor State or of a State having oversight experience with a	In an early phase of a nuclear energy pro- gramme it is recom-mendable to rely on the technical standards of the vendor state. Never-theless, it should not be the aim to rely forever on the technical stand- ards of the vendor state. For example, if the vendor state decides to phase out of nuclear power, also the tech-nical standards will not be updated and may			Yes	Para is for phase 3 and reference to and early phase may be unclear

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				reactor of the type selected. It is also useful to learn from the earlier independent anal- yses and safety assessments of this technology performed in other States. Furthermore, other regulatory bodies can give insights into the levels of quality achieved by key manufacturers and other suppliers, and this allows for better focusing of the auditing and evaluation of these organizations	become deprecated.				
Germany	23	2.87	ACTIONS 24– 38: REGULATORY FRAMEWOR K, Phase 3	As the regulatory body should con- duct inspections, it should ensure that it has the technical knowledge and skills and the statutory power to	It is an important requi-site, that the inspectors have access to the plant to perform inspections.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				enforce compliance					
				with its re-					
				quirements as					
				specified in the					
				appli-cable					
				regulations and in					
				licence conditions;					
				this applies during					
				the construction					
				phase also. <u>The</u>					
				legisla-tion should					
				include provisions					
				to grant access to					
				the plant for regula-					
				tors staff to perform					
				inspections, also					
				<u>non announced, at</u>					
				any time.					
Germany	24	2.96	ACTIONS 39–	5th line:	Grammar.	Yes			
			47:	" (including severe					
			TRANSPAREN	accidents conditions					
			CY AND	with a very low					
			OPENNESS,	probability of					
			Phase 2	occurrence)"					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	25	Action 49	ACTIONS 48– 60: FUNDING AND FINANCING, Phase 1	The government should consider the long term economic conditions of nuclear power plant operation, to <u>make</u> <u>requirements to</u> ensure that the operating organization is able to <u>will have the</u> <u>required financial</u> <u>resources to ensure</u> the safety of its nuclear power plants until the end of their planned operating lifetime.	The government cannot consider the long term economic conditions of NPP operation. The economic operation of a NPP is the responsibil-ity of the operating or-ganization. This action may be misunderstood to subsidize nuclear power by the govern-ment. The government can only require, that the operating organiza-tion will have sufficient financial resources.		Yes		edited for clarity
Germany	26	2.108	ACTIONS 48– 60: FUNDING AND FINANCING, Phase 1	The government should consider the financial aspects of the nuclear power programme <u>needed</u> <u>for establishing and</u> <u>maintaining the</u> <u>safety infrastructure</u> for it's <u>the</u> entire duration <u>of the</u> <u>nuclear power</u> programme, which	It is important to distin-guish between the fi-nancial resources need-ed for the design, con-struction, operation, waste management and decommissioning of the NPP, which are the (economic) burden of the operating organiza-tion, and the obligation of the government to establish and maintain the safety infrastructure.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				should not compromise safety at any stage.					
Germany	27	2.114	ACTIONS 48– 60: FUNDING AND FINANCING, Phase 3	By the end of Phase 3, the operating organization should establish rates for electricity generated, as allowed by the national tariff structure. The rate fixed should be set to provide funding for the sustainable safe operation of the nuclear power plant.	Delete 2.114 because the objective is not clear and importance to safe-ty is not clear. 2.114 addresses only an economic aspect, but not the nuclear safety. Prices are established by the market (e.g. stock exchange). If a NPP cannot be operated economically and the required financial re-sources can no longer ensured, it is the deci-sion of the utility to shut down the plant or find a solution for co-financing.		Yes		DELETED: as allowed by the national tariff structure
Germany	28	2.142	ACTIONS 61– 71: EXTERNAL SUPPORT ORGANIZATI ONS AND CONTRACTO	Application of quality standards for nuclear equipment and services is generally more stringent than for other industrial	SSR 2/1 as well as SSR 2/2 require an integrated management system.		Yes		Text was refrased for clarity

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
			RS, Phase 2	operations. If the					
				national policy					
				supports industrial					
				involvement in					
				construction or					
				support services,					
				then a plan for the					
				The operating					
				organization should					
				development of <u>an</u>					
				appropriate					
				management					
				systems.					
				Compliance with					
				requirements for					
				quality					
				management and					
				the safety of future					
				nuclear power					
				plants should then					
				be ensured.					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	29	2.153	ACTIONS 72– 84: LEADERSHIP AND MANAGEME NT FOR SAFETY, <i>General</i>	"In all the relevant organizations an integrated management system [16] is required to be implemented. The managers at all levels <u>are required</u> <u>to</u> demonstrate leadership which gives an overriding priority to safety and fosters a strong safety culture."	A Safety Guide should rather provide recommendations and guidance (i.e. 'should' statements) or refer to related safety requirements (i.e. 'shall' statements) than describe good practices. In fact, two requirements from GSR Part 2 (DS456) are referred to in Para 2.153. The phrase "is/are required to" is consistent with the wording elsewhere in this Safety Guide as far as requirements are addressed (compare with Paras 2.5, 2.6, 2.41, 2.221 and 3.51).	Yes			
Germany	30	2.157	ACTIONS 72– 84: LEADERSHIP AND MANAGEME NT FOR SAFETY, <i>General</i>	Efficient and effective integrated management systems constitute a cross-cutting element of the safety infrastructure, applicable for all the organizations involved in the nuclear power programme. However, as indicated in Fig. 6,	It is proposed to delete the last two sentences, because no further guidance is provided.			Yes	Clarifies Fig 6 and reinforces concept of phases

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				the extent of involvement of the different organizations will vary considerably during the different phases of implementation of the nuclear power programme. While the government is the major player in Phase 1, the regulatory body may not be created before Phase 2, and Phase 3 is the main phase for the implementation of the operating organization's programmes.					
Germany	31	2.158	ACTIONS 72– 84: LEADERSHIP AND MANAGEME NT FOR SAFETY, <i>General</i>	2 nd sentence: "In this regard, the requirements stated in GSR 3 GS-R-3 [16] should provide the basis for the manage-ment systems,"	To refer to the correct number of the related Safety Standards Series publication.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	32	after 2.165	ACTIONS 72– 84: LEADERSHIP AND MANAGEME NT FOR SAFETY, <i>Phase 3</i>	"Phase 3 The following actions are recommended to be completed in this phase as a step towards the full im- plementation of all relevant IAEA Safety Requirements: – – <u>Requirement 26</u> <u>of GSR Part 7</u> Requirements 5.37– 5.39 of GS-R-2 [26]; –"	Meanwhile, the Safety Requirements GS- R-2 have been superseded and replaced by GSR Part 7 (published in November 2015). Please refer to the valid IAEA Safety Standard. The quality management programme for emergency preparedness and response is addressed in Requirement 26 and subordinated Paras 6.34 to 6.39 of GSR Part 7.	Yes			
Germany	33	Action 85	ACTIONS 85– 98: HUMAN RESOURCES DEVELOPME NT, Phase 1	The government should consider a strategy for attracting, recruiting, training and retaining an adequate number of experts to meet the needs of all organizations involved in ensuring safety in a prospective nuclear	It should not be the role of the government to attract and recruit peo-ple or develop a strate-gy for this task. This strategy has to be de-veloped by each indi-vidual organization. The responsibility of the government could be to have a strategy for educating and training of future staff for the relevant organizations (e.g. bachelor / master courses in nuclear engi-neering, exchange pro-grammes with research centres / universities abroad, etc.)			Yes	It is part of the government decision to embark on a NPP

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				power programme.					
Germany	34	2.177	ACTIONS 85– 98: HUMAN RESOURCES DEVELOPME NT, Phase 1	The assessment process for education and training should include the development of a list of the areas of expertise necessary to support the development of the legal and regulatory framework, site evaluation, design assessment, construction and regulatory oversight, together with estimates of the number of	It is not only the task of the operating organiza-tion, but also for other relevant organizations (like the regulatory body, external expert organization, etc.)	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				individuals necessary in those functional areas. In later phases, expertise should be available for commissioning, operation, maintenance, radioactive waste management and emergency preparedness and response. These should be managed by the operating <u>relevant</u> organization through a systematic approach to training.					
Germany	35	Action 95	ACTIONS 85– 98: HUMAN RESOURCES DEVELOPME NT, Phase 3	"The operating organization, the regulatory body, external support organizations and all other relevant responseorganizatio ns response	Editorial (insert missing space).	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	36	2.187	ACTIONS 85– 98: HUMAN RESOURCES DEVELOPME NT, Phase 3	organizations should ensure the availability of sufficient competent human resources for the efficient and effective conduct of all activities at the appropriate time." " long term generic research programmes on safety that provide and preserve the	Wrong paragraphs are referred to.	Yes			
	27	2,402		strength of the nuclear power programme (see paras 2.190–2.201 2.192–2.203 on research for safety and regulatory purposes)."					
Germany	37	2.190	ACTIONS 85– 98: HUMAN RESOURCES DEVELOPME NT, Phase 3	" curriculums that are appropriate to meeting the needs of the nuclear power programmer, "	Editorial.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	38	2.192	ACTIONS 99– 104: RESEARCH FOR SAFETY AND REGULATORY PURPOSES, <i>General</i>	Vendors <u>and other</u> <u>organizations</u> can provide technical advice and support to the operating organization in the licensing stages and in the early years of operation, but these in-depth competences should be integrated in due time within the State. Long term safety research objectives should be established so as to reduce reliance upon vendors which it cannot be assumed will continue to exist throughout the lifetime of the nuclear power plant	Taking advice by the operator should not be limited to the vendor which might provide limited or old knowledge.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	39	2.193	ACTIONS 99-	Research in States	Analytical methods should not be limited	Yes			
			104:	commencing a	to "theoretical tools" but also to				
			RESEARCH	nuclear power	experimental ones to gather data e.g. for				
			FOR SAFETY	programme should	input into computer programs.				
			AND	be focused on the					
			REGULATORY	safety features and					
			PURPOSES,	core areas of the					
			General	prospective nuclear					
				power plants as well					
				as on site relat-ed					
				safety issues.					
				Analytical methods					
				should be learned					
				through national					
				research by					
				developing tools					
				(i.e. computer					
				programs) and					
				models <u>as well as</u>					
				<u>experimental</u>					
				methods (e.g. taking					
				samples to be					
				analyzed in					
				laboratories) that					
				can be used for					
				plant specific safety					
				analyses in later					
				stages. The					
				accumulated					
				knowledge could					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
				then be used for deterministic safety analysis and probabilistic safety analysis as well as for as-sessment of the behaviour of the reactor in transient conditions.					
Germany	40	2.194	ACTIONS 99– 104: RESEARCH FOR SAFETY AND REGULATORY PURPOSES, General	In addition to providing an increased understanding of the key characteristics of the prospective nuclear power plant and the safety issues relating to them, the research should serve the general development of knowledge of and competence in nuclear science and technology as well as scientific bases of radiation protection and waste	Scientific bases of radi-ation protection and waste management are quite different from that of nuclear science and are of importance in e.g. radiological impact assessment and radioac-tive waste management.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				<u>management</u> in the State. Research and development in the State should be directed at building competence in certain areas, and research constitutes good training in or preparation for all interested parties of what is to come with a nuclear power plant project.					
Germany	41	2.197	ACTIONS 99– 104: RESEARCH FOR SAFETY AND REGULATORY PURPOSES, Phase 1	National research activities should be considered and initiated as early as possible when considering launching a nuclear power programme. The areas of science and technology in which research and development are of vital importance for every State with a nuclear power plant in operation include	Added areas are at least of the same importance as the already mentioned ones.			Yes	There are many other areas. The listed ones are sufficient as examples.

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				reactor physics,					
				thermal hydraulics,					
				material sciences,					
				radiation transport					
				through shielding					
				(especially neutrons					
				<u>+ gammas),</u>					
				strength analysis					
				and probabilistic					
				safety assessment.					
				Examples of other					
				areas in which					
				research could be					
				considered are fire					
				safety, human					
				performance,					
				seismic analyses,					
				consequence					
				analysis for severe					
				accidents including					
				radiological impact					
				to population and					
				<u>environment (e.g.</u>					
				<u>atmospheric</u>					
				dispersion, water					
				<u>path)</u> , assessment					
				for beyond design					
				basis accidents and					
				management of					
				organizations.					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	42	2.198	ACTIONS 99–	In establishing new	International cooperation to be taken			Yes	Phase 1 is focus on
			104:	research	into account already in phase 1 can				awareness and
				programmes,	accelerate the process of establishing				therefore effort on
			FUR SAFETY	consideration	new research programmes and lower				researchmay be
				should be given to	costs.				premature
			REGULATORY	whether the					
			PURPUSES,	he conducted within					
			Phuse 1	the existing					
				institutions in which					
				the necessary					
				structures and					
				scientific and					
				academic networks					
				are already in place.					
				or whether a new					
				institution should					
				be set up. Both					
				approaches have					
				been used by States					
				in the past.					
				Moreover, possible					
				<u>international</u>					
				cooperation as well					
				<u>as support by</u>					
				<u>international</u>					
				organizations					
				<u>should be</u>					
				considered already					
				in phase 1 to					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
				<u>quicken the</u> <u>development of</u> <u>national</u> <u>competencies in an</u> <u>economic way.</u>					
Germany	43	2.200	ACTIONS 99– 104: RESEARCH FOR SAFETY AND REGULATORY PURPOSES, Phase 3	The national knowledge base should be strengthened by means of research groups established in vital areas of safety. These groups should participate in international networks in their respective areas, actively engaged in international research projects and some group members should be temporarily assigned to on the job training in research	Research in nuclear safety is often per- formed in international research activities, like large scale experiments, benchmark exercises, etc. Therefore, active en-gagement in interna- tional research projects shall be recommended too.			Yes	The existing text is general. No need to limit to groups engaged in international research

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				organizations in other States. The research in vital areas is aimed at creating an independent knowledge base within the State, which will be necessary to support the contracting and licensing process, and later to support safe plant operation and regulatory oversight of safety.					
Germany	44	2.204	ACTIONS 105–116: RADIATION PROTECTION , General	Humans have always been exposed to ionizing radiation (termed 'natural background radiation'), because of the radioactivity of material contained in rocks that form the Earth's crust and the exposure of the Earth's surface to	Although the first sen-tence is right, it does neither provide any guidance nor is it im-portant with respect to the safety fundamen-tals. Also harmful ef-fects from the natural occurrence of radioac-tive material (NORM) need to be addressed by a modern radiation pro-tection concept. Last sentence added from 2.207.			Yes	It is useful to keep even if it does not provide guidance. No need to repeat from 2.207

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				cosmic rays. The fundamental safety objective stated in the IAEA's Fundamental Safety Principles [1] is to protect people and the environment from harmful effects of ionizing radiation. <u>'People'</u> <u>in the context of</u> <u>this Safety Guide</u> <u>includes workers</u> <u>and the public.</u>					
Germany	45	2.205	ACTIONS 105–116: RADIATION PROTECTION , General	The principles of radiation protection are not specific to nuclear power plants but apply to all facilities and activities in which ionizing radiation is produced <u>as well as</u> <u>to exposure</u> <u>situations due to</u> natural sources.	Either exposures due to natural sources should be added (see GSR Part 3), or 2.205 can be de-leted, because it is not related to a nuclear power programme and may be out of the scope of this safety guide.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	46	2.206	ACTIONS 105–116: RADIATION PROTECTION , General	Facilities and activities that give rise to radiation risks must yield an overall benefit (Principle 4 of the IAEA's Fundamental Safety Principles [1], 'Justification of facilities and activities'). <u>The</u> <u>government should</u> <u>provide a list of</u> <u>justified activities. It</u> <u>is the responsibility</u> <u>of the licensee that</u> protection must be optimized to provide the highest level of safety that can reasonably be achieved (Principle 5 [1], 'Optimization of protection'). Measures for controlling radiation risks must ensure that no individual bears an unacceptable risk of	2.206 is just a short repetition of three principles in radiation protection: justification, optimization of protection and limitation of risk. The roles of the different organizations are not addressed. Typically, justification is the role of the government, optimization and meeting dose limits lies in the responsibility of the licensee. The role of the regulatory body is to assist the government in the process of justification and by verifying an adequate and efficient radiation protection concept of the licensee during licensing and oversight.			Yes	No need to discuss roles in this para.

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				harm (Principle 6 [1], 'Limitation of risks to individuals'). <u>It the prime</u> <u>responsibility of the</u> <u>licensee to</u> <u>determine the</u> <u>doses to workers</u> <u>and the public. The</u> <u>regulatory body</u> <u>should verify, that</u> <u>licensees will not</u> <u>exceed those dose</u> <u>limits for works and</u> <u>the public set in</u> <u>force by the</u> <u>government.</u>					
Germany	47	2.207	ACTIONS 105–116: RADIATION PROTECTION , General	This Safety Guide addresses the protection of people and the environment from harmful effects of ionizing radiation, as the fundamental safety objective of the IAEA's Fundamental Safety Principles [1]. 'People' in the	Information already given in para. 2.204. So, it is proposed to delete 2.207. See also our comment on 2.204.			Yes	Addressed in 2.204

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
				context of this Safety Guide includes workers and the public.					
Germany	48	Action 106	ACTIONS 105–116: RADIATION PROTECTION , Phase 1	The government should ensure <u>make</u> <u>arrangements for</u> that an initial <u>a</u> radiological environmental impact assessment in <u>such a way that it</u> <u>ca be</u> is conducted as appropriate on the basis of a defined set of criteria, at a regional scale and with the use of available data.	It seems too early in Phase 1 to require an initial radiological impact analysis. At least a concept of the later plant is necessary to estimate the inventory and possible releases in normal operation and accident conditions. The environmental impact assessment itself cannot be considered as part of the safety infrastructure, but all the prerequisites, like legislation, regulation, guidelines, etc. need to be developed during the three phases. With the proposed modification the consistency with 2.209 and 2.210 is increased.			Yes	The initial assessment will provide additional input for decision making at the end of phase 1
Germany	49	2.210	ACTIONS 105–116: RADIATION PROTECTION , Phase 1	"A Safety Guide on radiological environmental impact analysis <u>assessment</u> for the verification of radiological protection is being prepared to provide	For justification, see our related comment on Para 2.14.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				guidance on how to produce such a radiological environmental impact assessment."					
Germany	50	after 2.210	ACTIONS 105–116: RADIATION PROTECTION , Phase 2	"Phase 2 The following actions are recommended to be completed in this phase as a step towards the full implementation of all relevant IAEA Safety Requirements: - Requirements 1- 4, 6-16, 18-32 and Schedule III of GSR Part 3 [8]; "	Editorial (insert missing word).	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	51	2.211	ACTIONS 105–116: RADIATION PROTECTION , Phase 2	The State should adapt its arrangements for radiation protection to include specific needs for radiation protection in the commissioning, operation, associated fuel transport, management and storage of radioactive waste and spent fuel, and decommissioning of a nuclear power plant. This should cover radiation monitoring and radiation protection for workers <u>including</u> <u>accumulated dose</u> <u>to be registered at a</u> <u>state dose registry</u> and the public and protection of the environment, as	The operating organization and the state should take care for official dose registration not only for operator's employees but also for other company's employees even from abroad.			Yes	The formulation is general

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				radiation risks.					
Germany	52	Action 110	ACTIONS 105–116: RADIATION PROTECTION , Phase 2	The operating organization should update the radiological environmental impact assessment for the site selected, as appropriate.	An environmental im-pact assessment cannot be performed before the bidding process is final-ized and a concept for a certain reactor is select-ed. Thus it is proposed to delete action 110.			Yes	The intention is to initiate work s appropriate . Actions in phase 3 indicate that the work continues
Germany	53	Action 111	ACTIONS 105–116: RADIATION PROTECTION , Phase 2	The regulatory body should review and assess the radiological environmental impact assessment for the site selected, as appropriate.	As deletion of action 110 is proposed, conse-quently action 111 does not make sense and should be deleted too.			Yes	action is not deleted

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	54	2.213 last sentence	ACTIONS 105–116: RADIATION PROTECTION , Phase 2	The radiological environmental monitoring programme should be planned with the intent to verify that solid, liquid and gaseous radioactive releases from the operation of the nuclear power plant are kept as low as reasonably achievable, and are satisfactorily controlled and monitored so that authorized limits on discharges are complied with. Training in radiation protection should be incorporated in the operating organizations' systematic approach to training. <u>Responsible staff</u>	State and operator should ensure qualifica-tion of responsible staff by certificates, simple training in radiation protection is not enough.		Yes		Practices vary among countries

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				should possess official certificates of qualification to be renewed and approved after determined period of time.					
Germany	55	2.213 Last sentence	ACTIONS 105–116: RADIATION PROTECTION , Phase 2	The environmental monitoring should be commenced early in order to obtain accurate reference information on natural conditions with regard to radiation and other conditions in the <u>vicinity</u> neighborhood of the <u>selected site</u> nuclear power plant.	In Phase 2 probably no NPP is existing, thus the environmental mon-itoring programme to determine that back- ground radiation cannot be performed in the neighbourhood of the NPP. After a site is se-lected the monitoring can start at the site or in the vicinity of the site.	Yes			
Germany	56	2.214	ACTIONS 105–116: RADIATION PROTECTION , Phase 3	The radiation protection programme established by the operating	The radiation protection programme of the oper-ator should be approved by the state authority during licensing.			Yes	RP programme is not necessarily approved by the RB. It is always inspected by the RB.

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Germany	57	2.221	ACTIONS	organization and approved by the regulatory body should include arrangements for the control of contamination and for the monitoring of radiation levels inside the facility, releases of radioactive effluents, and occupational radiation doses. A general	It should be emphasized that the		Yes		Not always the methods
			117–121: SAFETY ASSESSMENT , General	understanding of safety features of nuclear power plants is required in order to make a knowledgeable decision on whether to embark on a nuclear power programme. A comprehensive safety assessment is required to support the decisions made	regulators safe-ty assessment is inde- pendent from the opera-tor by methods used and by acting experts.				are fully diverse

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				by the plant operators on the design and operation of the plant. An <u>independent</u> safety assessment with <u>diverse methods</u> is also required by the regulatory body before issuing authorizations for the construction, commissioning and operation of the plant.					
Germany	58	2.226	ACTIONS 117–121: SAFETY ASSESSMENT , Phase 1	The government should engage in a dialogue with governmental organizations in other States <u>and</u> <u>international</u> <u>organizations (e.g.</u> <u>IAEA, OECD)</u> so as to take account of developments in nuclear safety and safety assessment.	The government should consider experience and support offered by in- ternational organiza-tions as well.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	59	2.229	ACTIONS 117–121: SAFETY ASSESSMENT , Phase 2	"The development and use of the safety assessment should provide the framework for production of the necessary information to demonstrate compliance with the relevant safety requirements and for the radiological environmental impact analysis <u>assessment</u> that is carried out to support site evaluation and plant selection "	For justification, see our related comment on Para 2.14.	Yes			
Germany	60	2.232	ACTIONS 117–121: SAFETY ASSESSMENT , Phase 3	The operating organization should carry out a comprehensive safety assessment of the proposed design and operation of the plant, as part of the preparation of the	Risk should not be lim-ited to radiological ones.	Yes			
Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
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				safety analysis report. This safety assessment should address all <u>nuclear</u> <u>risks</u> , radiation risks to workers, the public and the environment from the operation of the nuclear power plant, and should demonstrate that these risks have been controlled and reduced to a level that is as low as reasonably achievable.					
Germany	61	2.233	ACTIONS 117–121: SAFETY ASSESSMENT , Phase 3	The operating organization should conduct an assessment of the safety information and analyses provided by the vendor for its (the operating organization's) preparation of the safety analysis	The operating organiza-tion should conduct an assessment of the safety information and anal-yses in accordance with the requests of the competent regulatory body.			Yes	It is clear from actions 119-121.

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				report in accordance with the requirements of the competent regulatory body before submitting it to the regulatory body. This requires the use of proper tools and the application of a management system. The assessment should include independent verification of the analyses provided by the vendor. This verification could be conducted either by the staff of the operating organization or by external support organizations.					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	62	2.239	ACTIONS 122–132: SAFETY OF RADIOACTIV E WASTE MANAGEME NT, SPENT FUEL MANAGEME NT AND DECOMMISSI ONING, <i>General</i>	A State considering a nuclear power programme is likely already to be engaged in activities involving sources of radiation (e.g. research reactors, or industrial or medical applications of radiation) which require arrangements for the predisposal management and disposal of low level and intermediate level radioactive waste.	This statement may be true, but it does not provide any further guidance.			Yes	It is appropriate as part of the general introduction
Germany	63	2.240	ACTIONS 122–132: SAFETY OF RADIOACTIV E WASTE MANAGEME NT, SPENT FUEL MANAGEME NT AND DECOMMISSI	Implementation of a nuclear power programme will cause a significant increase in the volume and activity of the waste that should be safely managed and disposed of. High level radioactive	It is not only a new challenge for countries embarking in nuclear energy, but is still a challenge for most countries having a long history in nuclear energy.		Yes		to clarify that it is an additional challenge

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Acceptea, but modified	Rejected	Reason for modification/ rejection
Germany	64	2.241	ONING, General ACTIONS 122–132:	waste with a very long lifetime <u>will</u> poses a new challenge for radioactive waste management. In addition to high level radioactive waste, there may also be spent fuel for which no future use is foreseen. 2 nd sentence: "The designation	Ensuring consistency with the terminology used in Paras 2.246 and	Yes			
Germany	65	2 243	SAFETY OF RADIOACTIV E WASTE MANAGEME NT, SPENT FUEL MANAGEME NT AND DECOMMISSI ONING, General	will depend on whether the chosen fuel cycle is closed or open (i.e. whether the fuel cycle requires the reprocessing or the direct disposal of the spent fuel)."	2.249. In a closed fuel cycle, the spent fuel is reprocessed and the high level waste arising from its reprocessing has to be disposed of, while in an open fuel cycle the spent fuel is directly disposed of.	Ves			
Germany	65	2.243	ACTIONS 122–132: SAFETY OF RADIOACTIV E WASTE	2 nd sentence: " the safety requirements of NS- R-5 [43] and the recommendations	Editorial.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
			MANAGEME NT, SPENT FUEL MANAGEME NT AND DECOMMISSI ONING, General	of the supporting Safety Guides would apply."					
Germany	66	2.245	ACTIONS 122–132: SAFETY OF RADIOACTIV E WASTE MANAGEME NT, SPENT FUEL MANAGEME NT AND DECOMMISSI ONING, Phase 1	The availability of alternative options for managing high level radioactive waste, including its disposal <u>or</u> <u>resending e.g. spent</u> <u>fuel to the</u> <u>producer</u> , should be considered before making a decision on launching a nuclear power programme. The possibility of ensuring long term safety by means of alternative options and the uncertainty of cost estimates in each option should be taken into	By resending spent fuel disposal can be avoid-ed.		Yes		returning the spent fuel to the fuel supplier

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				account.					
Germany	67	2.248	ACTIONS 122–132: SAFETY OF RADIOACTIV E WASTE MANAGEME NT, SPENT FUEL MANAGEME NT AND DECOMMISSI ONING, <i>Phase 2</i>	Alternative storage and disposal strategies for low level, intermediate level and high level radioactive waste and for spent fuel should be studied in Phase 2. The studies should focus on the safety, feasibility and costs of alternative strategies. As concerns the disposal of low level and intermediate level radioactive waste, it should be decided whether the operating organization will do this on the site, or whether there will	Options already planned or existing should be considered.			Yes	If it is already planned or existing it will be certainly considered

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				be a national approach with a disposal facility, and possibly a dedicated organization to operate such a facility <u>which might</u> <u>already be planned</u> <u>or existing for waste</u> <u>from medicine and</u> <u>research</u> .					
Germany	68	2.253	ACTIONS 122–132: SAFETY OF RADIOACTIV E WASTE MANAGEME NT, SPENT FUEL MANAGEME NT AND DECOMMISSI ONING, <i>Phase 3</i>	The processing facilities for low level and intermediate level radioactive waste should be incorporated as necessary into the nuclear power plant. It should be ensured that arrangements for reduction of the volume of waste and arrangements for the packaging of waste are in accordance with the radioactive waste	The processing of rad-waste can be done using international coopera-tion.			Yes	No need to state as a specific recommendation here. Internationalcooperatio n is promoted throught the whole safety guide. Interim storage facility can be constructed later.

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				management strategy. <u>Possible</u> <u>international</u> <u>cooperation should</u> <u>be taken into</u> <u>account.</u>					
Germany	69	2.255	ACTIONS 133–145: EMERGENCY PREPAREDNE SS AND RESPONSE, General	Safety features incorporated in the design of nuclear power plants and <u>an</u> effective <u>integrated</u> management system with a strong management commitment to safety and a strong safety culture are to ensure <u>aimed at</u> <u>ensuring</u> the practical elimination of plant event sequences that could result in high radiation doses or radioactive releases. However, despite the high level of confidence that the occurrence of such	GSR Part 2 (DS456) re-quires the establishment and implementation of an integrated manage-ment system. This term is also used in numerous other paragraphs and actions of this Safety Guide.		Yes		Risks from events abroad are included in the overall assessment of risks and there is no need to be specifically mentioned here.

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				sequences is					
				extremely unlikely					
				the application of					
				the concept of					
				defence in depth					
				requires additional					
				barriers to mitigate					
				the consequences					
				of radioactive					
				releases that could					
				potentially result					
				from accident					
				conditions.					
				Independently of					
				the development of					
				<u>a nuclear power</u>					
				programme, the					
				state should take					
				measures with					
				regards to					
				emergency proparadpass to ba					
				able to cope with					
				the potential danger					
				from abroad NDDs					
				Such measures					
				should be taken into					
				account when					
				developing an own					
				nuclear power					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
				programme.					
Germany	70	2.262	ACTIONS 133–145: EMERGENCY PREPAREDNE SS AND RESPONSE, Phase 1	"Due consideration should be given at the national level to the steps by which a State becomes a party to and ratifies the Convention on Early Notification of a Nuclear Accident [11] and the Convention on Assistance in the Case of a Nuclear Accident or Radiological Emergency [12]."	For the sake of com-pleteness, please insert the related reference numbers for both con-ventions.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	71	2.267	ACTIONS 133–145: EMERGENCY PREPAREDNE SS AND RESPONSE, Phase 2	"National activities with the intention of ratifying of the Convention on Early Notification of a Nuclear Accident [11] and the Convention on Assistance in the Case of a Nuclear Accident or Radiological Emergency [12] should be continued and should be completed as early as possible."	For the sake of com-pleteness, please insert the related reference numbers for both con-ventions.	Yes			
Germany	72	2.269	ACTIONS 133–145: EMERGENCY PREPAREDNE SS AND RESPONSE, Phase 3	Last sentence: "The State should be responsible for establishing arrangements for coordination, consistent with the relevant IAEA safety standards [26] and conventions [10– 13]. [Early Notification, Assistance, Nuclear	Please insert the relevant reference numbers. The four international conventions in question are already included in the list of references.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				Safety Conventions and Joint Convention]"					
Germany	73	3.3	ACTIONS 146–159: OPERATING ORGANIZATI ON, General	It is incumbent on the operating organization to specify safety criteria and to assure itself that the design, construction and operation of nuclear power plants meet the applicable safety criteria <u>defined in</u> <u>national regulations</u> <u>or approved by the</u> <u>regulatory body</u> . ()	The operating organiza-tion should define de-sign criteria, whereas safety criteria or ac-ceptance criteria should be defined by the regu-latory body and pub-lished in national regu-lations. It is the respon- sibility of the operating organization to meet the regulatory expected criteria. In addition, the operating organization could define further design criteria. (see GSR Part 4 para. 4.18 (d))	Yes			
Germany	74	3.5	ACTIONS 146–159: OPERATING ORGANIZATI ON, General	"Staffing of the operating organization and the development of its management system are addressed in paras 2.173– <u>2.191</u> 2.189 on human resources	Wrong paragraph is referred to.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				development and paras 2.152–2.172 on leadership and management for safety of this Safety Guide."					
Germany	75	3.7	ACTIONS 146–159: OPERATING ORGANIZATI ON, Phase 1	6 th bullet: "The design authority function (see paras 3.54– 3.75 3.53–3.74 on design safety);"	Wrong paragraphs are referred to.	Yes			
Germany	76	3.11	ACTIONS 146–159: OPERATING ORGANIZATI ON, Phase 2	Penultimate bullet: "To develop the operating organization's own effective and efficient <u>integrated</u> management system, including quality control, for construction and manufacturing, on the basis of good knowledge of national and international standards and requirements;"	GSR Part 2 (DS456) requires the establishment and implementation of an integrated manage-ment system. This term is also used in numerous other paragraphs and actions of this Safety Guide.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	77	3.21	ACTIONS 146–159: OPERATING ORGANIZATI ON, <i>Phase 3</i>	1 st bullet: "Safety analysis reports (see paras 2.215–2.235 <u>2.217–</u> <u>2.237</u> on safety assessment for further information)." 2nd bullet: "Probabilistic safety analyses (which might be included in the safety analysis report; see paras 2.215–2.235 <u>2.217–</u> <u>2.237</u> on safety assessment for further information on probabilistic safety analysis,"	Wrong paragraphs are referred to in the 1st and 2nd bullet.	Yes			
Germany	78	after 3.21	ACTIONS 146–159: OPERATING ORGANIZATI ON <i>, Phase 3</i>	The operating organization should develop in close liaison with the vendor the procedures for normal operation and to control anticipated operational	Procedures and guidelines (operating procedures, EOPs, SAMGS, etc.) are essential for the safe operation of the plant. This should be emphasized in an own paragraph and distinguished form various management programmes addressed in para. 3.23.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, hiit	modified	Rejected	Reason for modification/ rejection
				occurrences and accident conditions.						
				For more severe accident condition						
				guidelines shall be in developed						

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	79	3.23	ACTIONS 146–159: OPERATING ORGANIZATI ON, Phase 3	As required by SSR- 2/2 [17], it is the responsibility of the operating organization to develop operating procedures and management programmes important to safety. As stated in NS-G- 2.4 [29], the areas to be covered by various management programmes for the safe operation of the plant should include, but are not limited to, the following: - Staffing (see paras 2.173- 2.1912.189 on human resources development); - Qualification and training (see paras 2.173-2.1912.189 on human resources	See our new proposal above. Wrong paragraphs are referred to in several bullets.			Yes	title change not acepted

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				development);					
				 Commissioning 					
				(see paras 3.76–					
				3.86 <u>3.75–3.85</u> on					
				preparation for					
				commissioning);					
				– Radiation					
				protection (see					
				paras 2.202–2.214					
				2.204–2.216 on					
				radiation					
				protection);					
				– Waste					
				management (see					
				paras 2.230-2.252					
				$\frac{2.256-2.254}{\text{cafety of radioactive}}$					
				waste management					
				spont fuel					
				management and					
				decommissioning).					
				– Environmental					
				monitoring (see					
				paras 2.202–2.214					
				2.204–2.216 on					
				radiation protection					
				and paras 3.26-3.35					
				<u>3.25–3.52</u> on site					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				survey and site evaluation); – Emergency preparedness (see paras 2.253–2.269 <u>2.255–2.271</u> on emergency preparedness and response); – Plant modifications (see paras 3.54–3.75 <u>3.53–3.74</u> on design safety); Decommissioning (see paras 2.236– 2.252 <u>2.238–2.254</u> on safety of radioactive waste management, spent fuel management and decommissioning)."					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	80	3.25 to 3.52,	ACTIONS	Note:	Harmonization of terminology and its	Yes			
		Figure 7	160–169:	In the subsection	usage in the Safety Standards Series				
			SITE SURVEY	"Actions 160–169:	publications is strongly recommended.				
			AND SITE	Site survey and site					
			EVALUATION	evaluation", the					
				second stage of the					
				site evaluation					
				process is					
				designated as 'site					
				as-sessment stage'.					
				In contrast to that,					
				the IAEA Safety					
				Guide SSG-35 "Site					
				Survey and Site					
				Selection for					
				Nuclear					
				Installations" uses					
				the term site					
				characterization					
				bas also boon					
				incorporated into					
				the IAFA Safety					
				Glossary (Draft 2016					
				Revision) available					
				at http://www-					
				ns.iaea.org/downlo					
				ads/standards/gloss					
				arv/iaea-safety-					
				glossary-draft-					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				2016.pdf. For consistency reasons, the terminology established in SSG- 35 should be followed in DS486.					
Germany	81	3.26	ACTIONS 160–169: SITE SURVEY AND SITE EVALUATION , General	"The site selection process, also called siting <u>process</u> for a new nuclear installation, is divided into two stages. In the first stage, 'site survey', <u>usually large regions</u> <u>are investigated to</u> <u>find potential sites</u> <u>are considered on</u> the basis of existing available data and <u>to identify</u> suitable candidate sites are chosen (Phase 1). <u>In</u> T <u>t</u> he second stage, 'site selection', is aimed to select the	 1st sentence: Ensuring consistency with the terminology used in Figure 7, as well as with the one in the Safety Guide SSG-35 "Site Survey and Site Selection for Nuclear Installations" (see Paras 2.2–2.3 and Figure 1 therein). 2nd and 3rd sentence: To provide a more precise description of site survey and site selection, based on Para 2.3 of SSG-35. 		Yes		editorial

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				site and is the completion of the site selection process <u>unsuitable</u> <u>sites are rejected</u> and the remaining <u>candidate sites are</u> <u>assessed by</u> <u>screening and</u> <u>comparing them on</u> <u>the basis of safety</u> <u>and other</u> <u>considerations, to</u> <u>arrive at the</u> <u>preferred candidate</u> <u>site</u> . In stage 3,"					
Germany	82	3.33	ACTIONS 160–169: SITE SURVEY AND SITE EVALUATION , Phase 1	"While 'acceptability' (or exclusion) criteria in relation to safety are well defined in accordance with IAEA safety standards [2] [59], the criteria for comparison of the candidate sites may differ from State to State and from one phase to another on	The IAEA document "Considerations to Launch a Nuclear Power Programme" (Ref. [2]) is neither a Safety Stan-dards Series publication, nor does it address criteria for acceptability or exclusion in relation to site survey and site eval-uation. Exclusion criteria to be used as part of the screening process at the site survey stage are defined in the Safety Guide SSG-35. Therefore, a new Ref. [59] to this publication should be included here.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				the basis of the results obtained and the iterative nature of the process." Please add the IAEA Safety Guide SSG-35 to the list of references: "[59] INTERNATIONAL ATOMIC ENERGY AGENCY, Site Survey and Site Selection for Nuclear Installations, IAEA Safety Standards					
				Series No. SSG-35, IAEA, Vienna (2015)."					
Germany	83	3.34	ACTIONS 160–169: SITE SURVEY AND SITE EVALUATION , Phase 1	"These criteria should provide for a consistent set of boundary conditions from different fields that will exclude unacceptable sites in the early stages of the programme siting process. This	Clarification.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				will leave for further consideration those sites that fulfil the acceptability conditions."					
Germany	84	3.37	ACTIONS 160–169: SITE SURVEY AND SITE EVALUATION , Phase 1	1 st sentence: "The expected impacts of the plant on the public and the environment should be considered, to estimate the consequences of discharges in normal operation and potential radioactive releases resulting from <u>incidents and</u> accidents."	Amendment for completion.	Yes			
Germany	85	3.37	ACTIONS 160–169: SITE SURVEY AND SITE EVALUATION , Phase 1	Last sentence: "This should be done as part of the radiological environmental impact assessment addressed in paras 2.202–2.214 <u>2.204–</u> 2.216 on radiation	Wrong paragraphs are referred to.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				protection."					
Germany	86	3.41	ACTIONS 160–169: SITE SURVEY AND SITE EVALUATION , Phase 2	3 rd sentence: "At this stage a full, specific and detailed evaluation of the site selected is carried out to confirm its acceptability, to derive the site related design basis and to prepare the radiological en- vironmental impact analysis <u>assessment</u> , as well as the non- radiological impact assessment (for example, of impacts of thermal discharges, chemical discharges) in accordance with the national regulatory framework "	For justification, see our related comment on Para 2.14.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	87	3.52	ACTIONS 160–169: SITE SURVEY AND SITE EVALUATION , Phase 3	"Activities for radiological environmental impact analysis <u>assessment</u> or environmental monitoring are addressed in paras 2.202–2.214 <u>2.204–</u> <u>2.216</u> on radiation protection."	Wrong paragraphs are referred to. With respect to REIA, see our related comment on Para 2.14.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	88	3.55	ACTIONS 170–184: DESIGN SAFETY	In the 2 nd clause, adjustment of text with the one in SSR- 2/1 Rev. 1 (published in February 2016) is recommended as follows: "Rev. <u>1</u> of SSR-2/1 [33] also states, inter alia, that: ' <u>Event</u> Ssequences that would lead to large or early radioactive releases are required to be 'practically eliminated'. - The levels of defence in depth shall be independent as far as practicable to avoid a failure of one level reducing the effectiveness of other levels; - <u>Causation and likelihood shall be</u> <u>considered in</u> <u>postulating</u> <u>potential hazards;</u> - Items important to safety shall be	Paras cited below in this column are those from SSR-2/1 Rev. 1 for comparison: Para 2.13, bullet (4) Please add a bullet at the beginning of the list. Para 5.17 Para 5.15A; the require-ment "Causation and likelihood shall be considered in postulating potential hazards" (Para 5.17) should be listed separately as it doesn't fit into the text of Para 5.15A. Para 5.21A Para 5.73 98	Yes			
	1			designed and	Para 6.19B		1		

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	89	3.87	ACTIONS 189–192: TRANSPORT SAFETY, <i>General</i>	3 rd sentence: "Fresh nuclear fuel has a very low level of radioactivity, and the main technical means for ensuring its safe transport should be the design of a transport package that controls the risk of <u>nuclear</u> criticality through its structural and containment features."	To be in line with the terminology used in Para 3.88 (3rd sentence) concerning the safe transport of spent fuel.	Yes			
Germany	90	3.88	ACTIONS 189–192: TRANSPORT SAFETY, General	3 rd sentence: "The possibility <u>risk</u> of nuclear criticality and damage caused by heat <u>and other</u> <u>hazardous</u> <u>conditions</u> should also be taken into consideration."	To be in line with the terminology used in Para 3.87 (3rd sentence) concerning the safe transport of fresh fuel. Heat is not the only hazardous condition.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	91	3.96	ACTIONS 189–192: TRANSPORT SAFETY, <i>Phase 1</i>	8 th bullet: <i>"Issuing of</i> <i>approvals.</i> The issuing of approvals may be a new process for the regulatory body. The approval system may be modelled on other industries within the country (for example, aircraft certification) or other systems in Member States identified through networking and interactions with other Member States."	Harmonization of ter-minology throughout this Safety Guide is recommended. In nu-merous other paragraphs of this document, solely the term 'States' is used.	Yes			
Germany	92	3.104	ACTIONS 193–197: INTERFACES WITH NUCLEAR SECURITY, General	"During each phase of the development process of a nuclear power programmer, "	Editorial.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	93	Footnotes		Please note that • Footnote number 3 inadvertently occurs twice (on pages 6 and 19, respectively); • Footnote numbers 9, 14 and 17 have been emitted	Multiple errors occur in the numeration of footnotes. Renumeration is required to follow a consecutive numbering throughout this Safety Guide.	YES to be done			
Germany	94	Ref. [2]		GOV/INF/2007/2, IAEA, Vienna (2007)."	Completeness of citation. This publication was provided for information to the IAEA's Board of Governors as GOV/INF/2007/2 in March 2007.	Yes			
Germany	95	Ref. [14]		" <u>Convention on the</u> <u>Physical Protection</u> <u>of Nuclear Material</u> <u>and the</u> <u>Amendment</u> <u>thereto,</u> INFCIRC/274/Rev.1, IAEA, Vienna (1980) and GOV/INF/2005/10- GC(49)INF/6, IAEA, Vienna (2005)."	For the sake of com-pleteness, please add the title of the conven-tion in question (re-ferred to in Para 2.25).	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Germany	96	Ref. [28]		"INTERNATIONAL ATOMIC ENERGY AGENCY, <u>Use of</u> External Expert <u>s by</u> <u>the Regulatory Body</u> Support on Safety Issues, IAEA Safety Standards Series <u>No. GSG-4</u> , IAEA, Vienna (in preparation)	This is the correct title of the Safety Guide GSG-4 published in 2013 (currently under revision by DS472).	Yes			
Germany	97	Ref. [46]		(2013)." Missing reference number in the list of references. Ref. [46] is referred to in Para 3.44.	Editorial.	Yes			
Germany	98	Ref. [56]		"INTERNATIONAL ATOMIC ENERGY AGENCY, Establishing the Nuclear Security Infrastructure for a Nuclear Power Programmer,"	This is the correct title of NSS-19.	Yes			
Indonesia									
Indonesia	1	Appendix phase 2 action number 75, 76, 77.		List of colour assignment for the entity is missplaced	Colour Assignment should be the Regulatory and operating organization	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
Indonesia	2	Appendix phase 2 action unmber 92		List of colour assignment for the entity is missplaced	Colour Assignment should be the Regulatory and operating organization	Yes			
Japan									
Japan	1	2.2, 2.59, 2.106, 2.129, 2.257, 2.266,3.24,3.42, 3.56	ACTIONS 1– 10: NATIONAL POLICY AND STRATEGY FOR SAFETY, General; ACTIONS 24– 38: REGULATORY FRAMEWOR K, General; ACTIONS 48– 60: FUNDING AND FINANCING, General; ACTIONS 61– 71: EXTERNAL SUPPORT ORGANIZATI ONS AND	Some of the added portion of this draft use "need(s) to (verb)" as recommended practice. Those descriptions are suggested to use "should" statement.	Editorial. Recommended practices should be described using "should" statement.		Yes		It was agreed to use this formulation in the original version. It is being used mainly in the general part of each section

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
			CONTRACTO						
			RS, General;						
			ACTIONS						
			133–145:						
			EMERGENCY						
			PREPAREDNE						
			SS AND						
			RESPONSE,						
			General;						
			EMERGENCV						
			PREPAREDNE						
			SS AND						
			RESPONSE.						
			Phase 2:						
			ACTIONS						
			146–159:						
			OPERATING						
			ORGANIZATI						
			ON, Phase 3;						
			ACTIONS						
			160–169:						
			SITE SURVEY						
			AND SITE						
			EVALUATION						
			, Phase 2;						
			ACTIONS						
			1/0-184:						
	1		DESIGN						

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
			SAFETY, General						
Japan	2	2.22/ line 4	ACTIONS 11– 19: GLOBAL NUCLEAR SAFETY REGIME, <i>Phase 1</i>	Add original words in parenthesis as follows; "EPR(Emergency Preparedness and Response)"	Editorial. As the term "EPR" first appears here, its original words should be written down.	Yes			
Japan	3	Action 39/ Line 3	ACTIONS 39– 47: TRANSPAREN CY AND OPENNESS,	to facilitate their involvement in the decision making <u>process</u> on a prospective nuclear	To keep consistency with GSR Part 1 (Rev. 1) para. 2.5 (4).	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
			Phase 1	power programme.					
Japan	4	2.92/ line 7	ACTIONS 39– 47: TRANSPAREN CY AND OPENNESS, Phase 1	The government should establish a clear <u>decision</u> <u>making process</u> to justify a nuclear power programme, and <u>this process</u> should be communicated to the interested parties. Involving the public in the early stages of decision making t <u>his</u> <u>process</u> regarding nuclear power should be prioritized.	Amendment to make the description easy to understand considering context of preceding sentence.		Yes		edited for clarity

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Japan	5	2.177	ACTIONS 61– 71: EXTERNAL SUPPORT ORGANIZATI ONS AND CONTRACTO RS, General	The assessment process for education and training should include the development of a list of the areas of expertise necessary to support the development of the legal and regulatory framework, site evaluation, design assessment, construction and regulatory oversight, emergency preparedness and response, together with estimates of the number of individuals necessary in those functional areas. In later phases, expertise should be	To keep consistency with the below sentence from para 2.258, which raises the importance of considering EPR arrangement the at early stage of the nuclear programme "In addition to specific roles and responsibilities of the regulatory body and the operating organizations in relation to the plant safety in general and in on-site emergency arrangements specifically, considerations of overall emergency preparedness and response will include respective response organizations at local, regional and national levels. <u>Recognition of the need</u> <u>for their engagement as early as possible</u> <u>in the overall consideration of the nuclear</u> power programme is essential.	Yes			
				available for commissioning, operation,					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				maintenance <u>, and</u> radioactive waste management and emergency preparedness and response.					
Japan	6	2.234	ACTIONS 117–121: SAFETY ASSESSMENT , Phase 3	Where practicable, the safety assessment <u>should</u> confirms that there are adequate margins to avoid cliff-edge effects. If facilities share resources (whether human or material) in accident conditions the safety assessment should	Editorial. Description in this paragraph should be in form of recommendation.	Yes			
Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
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				demonstrates that the required safety functions can nevertheless be fulfilled at each facility during such conditions.					
Japan	7	2.255/ line 7	ACTIONS 133–145: EMERGENCY PREPAREDNE SS AND RESPONSE, General	requires additional barriers <u>measures</u> to mitigate	As the term "barriers" is apt to be considered as something tangible object such as mechanical structure, a word presenting both physical structure and procedure is suggested to be used here.	Yes			
Japan	8	2.256/ line 2	ACTIONS 133–145: EMERGENCY PREPAREDNE SS AND RESPONSE, General	Emergency preparedness and response for the protection of human life, <u>and</u> health, property and the environment is an essential element	Amendment to make the description consistent with the Principle 9 para3.34 3rd bullet of SF-1 which states as follows: "For any incidents that do occur, to take practical measures to mitigate any consequences for human life and health and the environment." ("property" is not included.)	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
			133–145: EMERGENCY PREPAREDNE	Below sentence should be moved to footnote.	Those documents other than Safety Standards are not consensus document so those documents should be referred in				references in the reference list
			SS AND RESPONSE, General	"Another publication in the Emergency	the footnote.				
				Preparedness and Response Series provides					
				considerations in emergency preparedness and					
				response for States embarking on a nuclear power					
				Embarking 2012] supporting,					
				IAEA Safety Standards, the					
				adequate level of emergency preparedness and					
				response in relation to the nuclear power programme."					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Japan	10	3.31/ line7	ACTIONS 160–169: SITE SURVEY AND SITE EVALUATION , Phase 1	The public should be engaged <u>involved</u> at these early stages	To keep consistency with para 2.92.	Yes			
Japan	11	3.51	ACTIONS 160–169: SITE SURVEY AND SITE EVALUATION , Phase 3	Site specific hazards are required to <u>should</u> be periodically reviewed, typically every ten years, and re-evaluated when necessary. A review after a shorter interval shall <u>should</u> be considered in the event of evidence of potentially significant changes in hazards (for example, in the light of the feedback of operating experience, a major accident or the occurrence of extreme events). The implications of such a review of site	Editorial. Suggesting to use "should" statement.			yes	The para deals with requirements to periodic safety review. We avoided the use shall because it it a safety guide

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
				specific hazards for the safe operation of the nuclear installation have to <u>should</u> be evaluated.					
Republic of Korea									
Republic of Korea	1	Page 3 Paragraph 1.5	1. Introduction Background	In 2010 <u>2016</u> , the IAEA Board of Governors approved for publication an IAEA Safety Requirements publication on the Governmental, Legal and Regulatory Framework for Safety [5], which establishes requirements in respect of the infrastructure for safety.	[note] For clearer infromation (GSR Part 1, Rev. 1 was published in Feb. 2016.)	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
Republic of Korea	2	Page 169 Reference		[5] INTERNATIONAL ATOMIC ENERGY AGENCY, Governmental, Lergal and Regulatory Framework for Safety, IAEA Safety Stadnards Series No. GSR Part 1 Rev.1, IAEA Viena, (20152016)	[note] For clearer infromation (GSR Part 1, Rev. 1 was published in Feb. 2016.)	Yes			
Republic of Korea	3	Page 14 Fig. 5	Structure	Section 3, Specific Safety Requirement -20 Elements of the Safety Infrastrcuture 20 - Interfaces with nuclear security - Main Supporting Safety Requirements Identified GSR Part 1 <u>SSR-2/1</u> -Corresponding Number the Long- Term Structure GSR Part 1	[notice] It is necessary to add SSR-1/2 and SSR-2/2 as main supporting IAEA Safety Requirements related to the interfaces with nuclear security. Requirement 8 of SSR-2/1 covers the interfaces of safety with security and safeuguards. In addition, Requirement 17 of SSR-2/2 covers the consideratio of objectives of nuclear security in safety programme.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				<u>SSR-2/1</u> <u>SSR-2/2</u>					
Republic of Korea	4	Page 135		The following actions are recommended to be completed in this phase as a step towards the full implementation of all relevant IAEA Safety Requirements: - Requirement 12 of GSR Part 1 [5]; - Requirement 2.1 of GS-R-3 [6]; - Requirement 5 of GSR Part 5 [9]; - Requirement 2 and	[notice] Same as the reason for Comment No. 3	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
				23 of GSR Part 7 [26] <u>- Requirement 8 of</u> <u>SSR-2/1 [33];</u> <u>- Requirement 17 of</u> <u>SSR-2/2 [17]</u>					
Republic of Korea	5	Page 168 (20- Interfaces with nuclear security)	.Appendix OVERVIEW OF ACTIONS TO BE TAKEN IN EACH PHASE FOR THE ESTABLISHM ENT OF SAFETY INFRASTRUC TURE, Phase 3	Basis - Requirement 12 of GSR Part 1 [5] - Requirement 2.1 of GS-R-3 [6]; - Requirement 5 of GSR Part 5 [9]; - Requirement 2 and 23 of GSR Part 7 [26]; <u>- Requirement 8 of</u> <u>SSR-2/1 [33];</u> <u>- Requirement 17 of</u> <u>SSR-2/2 [17]</u>	[notice] Same as the reason for Comment No. 3	Yes			
Poland									

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Poland	1	2.13 / page 18	ACTIONS 1– 10: NATIONAL POLICY AND STRATEGY FOR SAFETY, <i>Phase 1</i>	/not able to propose/	Please supplement this recommendation with additional references, i.e. what types of activities the State (where research reactors already operate) needs to take into consideration.			Yes	Actions 1-4 provide the basis for the activitiesthat need to be initiated. The ref to research reactors is only to highlight that some of these activities may have been initiated.
Poland	2	2.8	ACTIONS 1– 10: NATIONAL POLICY AND STRATEGY FOR SAFETY, general	A State that is considering launching a nuclear power programme is likely to look for proven existing technologies rather than developing a specific new design. Nevertheless, the choice will be made from among various available technologies. Such a choice may be made at different times depending on the overall policy, but in any case, the policy should emphasize the effective transfer of	The alternative strategy presented in the documents seems to be an example of potential options of the strategy to be applied. The State may also decide that the implementation of the nuclear programme and issues related to transfer of technology may be dealt with by a project company established for that purpose. Such company will conduct relevant activities under the indirect supervision and with the support of the State.			Yes	Text is clear as is

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				competence in					
				safety to the State.					
				If there is a strategy					
				of the State to					
				establish an early					
				partnership with a					
				certain other State,					
				the selection of a					
				technology can take					
				place in Phase 1 as					
				part of the decision					
				process to move					
				forward with the					
				nuclear option, or					
				early in Phase 2. In					
				such a case, the					
				partnersnip					
				perween the state					
				tochnology and the					
				State ombarking on					
				a nuclear nower					
				nrogramme should					
				include agreements					
				at the governmental					
				level to establish					
				the framework for					
				and objectives of					
				such cooperation					
				The State can also					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				apply alternative strategies. — Example of such alternative strategy is described in this Safety Guide, according to which the State can aim at developing a national knowledge base through a large network of international contacts during Phase 2, and then to open a bidding process.					
Poland	3	para 2.22, pg. 22	ACTIONS 11– 19: GLOBAL NUCLEAR SAFETY REGIME, Phase 1	States embarking on a nuclear power programme should cooperate particularly with those States that may be directly impacted by an emergency (i.e. States with territories within emergency planning zones and distances	This is the first place where there is the acronym. It shall be here to develop his.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				[26]) towards ensuring exchange of information relevant to Emergency Preparedness and Response (EPR) in relation to the nuclear power programme. Such a coordination and cooperation should be done on all levels from local authorities and response organizations to national authorities and response organizations including regulatory body, as necessary.					
Poland	4	2.24	ACTIONS 11– 19: GLOBAL NUCLEAR SAFETY REGIME, Phase 1	Regular multilateral and bilateral cooperation between the relevant national and international organizations that is	Ensuring consistency with GSR Part 1 (Rev. 1) and other reviewed safety standards			Yes	No need to use the same text to keep consistency

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Poland	5	2.26		aimed at enhancing safety by means of harmonized approaches as well as increasing quality and effectiveness of safety reviews and inspections, by means of sharing of knowledge and feedback of experience.	We suggest to delete the last sentence as	Vac			
Poland	5	2.26	ACTIONS 11– 19: GLOBAL NUCLEAR SAFETY REGIME, Phase 2	One important consideration in the successive decision processes in a nuclear power programme is the interdependence of activities relating to nuclear power between all States. In Phase 2, activities that are required in the international agreements and conventions identified in Phase 1 should therefore be commenced. This	We suggest to delete the last sentence as it describes different ways in which a State may express its will to be bound by the obligations resulting from the international law, and the above issue is not a subject of the document as such.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				will help to promote					
				safety nationally					
				and globally, as well					
				as enhancing					
				international					
				confidence and					
				trust.					
				DELETED: One					
				important					
				consideration in the					
				successive decision					
				processes in a					
				nuclear power					
				programme is the					
				interdependence of					
				activities relating to					
				nuclear power					
				Detween all States.					
				that are required in					
				that are required in					
				agreements and					
				conventions					
				identified in Phase 1					
				should therefore be					
				commenced. This					
				will help to promote					
				safety nationally					
				and globally, as well					
				as enhancing					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				international confidence and trust.					
Poland	6	2.28	ACTIONS 11– 19: GLOBAL NUCLEAR SAFETY REGIME, Phase 2	Effective participation of the operating organizations, regulatory bodies and other relevant entities in international activities and networks promotes the transfer of knowledge on lessons learned and best practices from other States. This includes reporting	Clarification of addressees of the recommendation.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				operating and regulatory experience to the networks in timely manner. It also facilitates the provision of support by States with advanced nuclear power programmes. Such support could include two way long term assignments of experts: whether consultants from other States coaching the developing organizations or experts sent to other States for on the job training.					
Poland	7	2.30/pg. 32	ACTIONS 11– 19: GLOBAL NUCLEAR SAFETY REGIME, Phase 3	The State should participate in the review meetings of the relevant international conventions to which it has become	Participating in review meeting is very important, but other obligations arising from being a party to Conventions are as much important and should be understood by State.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				a party and fulfill other obligations resulting from becoming a party.					
Poland	8	2.31	ACTIONS 11– 19: GLOBAL NUCLEAR SAFETY REGIME, <i>Phase 3</i>	The regulatory body, the operating organization and other relevant entities should strengthen their cooperation with their respective counterparts in other States and with international networks of respective entities.	Clarification of the scope of entities participating in the international networks.			Yes	Not required
Poland	9	2.35	ACTIONS 11– 19: GLOBAL NUCLEAR SAFETY REGIME, Phase 3	The operating organization should establish professional cooperation arrangements with operating organizations in other States especially the ones using the same or similar technology,	The cooperation arrangements should be established with operating States using the same or similar technology.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
				as well as with international operator organizations such as the World Association of Nuclear Operators (WANO).					
Poland	10	2.40	ACTIONS 20– 23: LEGAL FRAMEWOR K, Phase 1	On the basis of such an assessment, the State should develop a plan to enhance its existing legal and regulatory framework to incorporate all elements of nuclear legislation. The IAEA's Handbook on Nuclear Law [19] provides detailed guidance on this subject.	Clarification of the scope of the elements.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Poland	11	2.41/point (2)	ACTIONS 20– 23: LEGAL FRAMEWOR <i>K, Phase 1</i>	A nuclear law, which should ensure transparency and should be clearly understandable, is prepared in Phase 1 so as to be enacted early in Phase 2. As established in GSR Part 1 [5], para. 2.5, a governmental, legal and regulatory framework for safety is required to set out the following: (2) The types of facilities and activities that are included in the scope of the regulatory framework (and that should be licensed in connection with nuclear power	Clarification that the scope refers to the regulatory framework.			Yes	consistency with GSR part 1

								1	
Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Poland	12	2.41/point (8)	ACTIONS 20-	Provision for the	Ensuring consistency with GSR Part 1			Yes	consistency with GSR
			23: LEGAL	review and	(Rev. 1) and other reviewed safety				part 1
			FRAMEWOR	assessment of	standards				
			K, Phase 1	facilities and					
				activities, in					
				accordance with a					
				graded approach,					
				including routine					
				evaluation of					
				operating					
				experience and					
				performance of					
				comprehensive					
				periodic safety					
				reviews of facilities,					
				such as nuclear					
				power plants (see					
				also paras 2.215-					
				2.235 on safety					
				assessment);					
Poland	13	2.41/point (16)	ACTIONS 20-	Responsibilities and	Grammatical correction			Yes	not necessary
			23: LEGAL	obligations in					
			FRAMEWOR	respect of financial					
			K, Phase 1	provision for the					
				management of					
				radioactive waste					
				and of spent fuel,					
				and for					
				decommissioning of					
				facilities and the					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
				termination of activities (see also paras 2.236-2.252 on safety of radioactive waste management, spent fuel management and decommissioning, and paras 2.106- 2.115 on funding and financing);					
Poland	14	2.41/point (17)	ACTIONS 20– 23: LEGAL FRAMEWOR K, Phase 1	The criteria for release of the facilities or activities from regulatory control;	Clarification of the scope of regulatory control release				consistency with GSR part 1
Poland	15	Action 32.	ACTIONS 24– 38: REGULATORY FRAMEWOR K, Phase 2	The regulatory body should begin establishing a suitable working relationship with the operating organization and with other relevant national and international organizations, including regulatory bodies of other	Ensuring consistency with GSR Part 1 (Rev. 1) and other reviewed safety standards			Yes	The action is consistent with GSR part 1

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				States to promote cooperation and the exchange of regulatory related information and experience,					
Poland	16	2.65	ACTIONS 24– 38: REGULATORY FRAMEWOR K, Phase 2	The regulatory body should be functionally separated from and effectively independent of all entities having responsibilities or interests that could unduly influence its safety related decision making — including parts of the government — that promote the development of the nuclear industry. The regulatory body should have the legal authority, technical competence and resources to fulfil its statutory obligation	Ensuring consistency with GSR Part 1 (Rev. 1) and other reviewed safety standards	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				to regulate facilities and activities, and its regulatory decisions should be free from undue political and economic influence.					
Poland	17	2.73/ pg.40	ACTIONS 24– 38: REGULATORY FRAMEWOR K, Phase 2	Regulations that could have an impact on the choice of technology should be established early in the process. The plan and schedule for the development of other regulations should be prepared. In developing regulations and guides as well as in their periodical reviewing and amending, the regulatory body should take into consideration information from	It is highly likely that created rules based on general standards are not aligned in all aspects with the specific reality. Robust cooperation between regulatory body and interested parties would facilitate development of regulations.			Yes	there are several other modes for exchange of information

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
				the feedback of experience and comments from interested parties. Such exchange of information may be performed by the use of coordination mechanism.					
Poland	18	2.77	ACTIONS 24– 38: REGULATORY FRAMEWOR K, Phase 2	The relation between the regulatory body and the operating organization should be based on mutual understanding and respect as well as frank and open communication providing constructive liaison on safety related issues and in-depth technical dialogue between experts. The relation should apply the principle that the prime responsibility for safety rests with the	Ensuring consistency with GSR Part 1 (Rev. 1) and other reviewed safety standards	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				operating organization and the primary role of the regulatory body is to ensure that the operating organization fulfils its responsibilities.					
Poland	19	2.80	ACTIONS 24– 38: REGULATORY FRAMEWOR K, Phase 3	In many cases, it is helpful to accept the use of technical standards of the vendor State or of a State having oversight experience with a reactor of the type selected. It is also useful to learn from the earlier independent analyses and safety assessments of this technology performed in other States. Furthermore, other regulatory bodies can give its regulatory	Clarification that the cooperation relates to regulatory bodies.			Yes	Text is clear as is

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				counterparts from other States insights into the levels of quality achieved by key manufacturers and other suppliers, and this allows for better focusing of the auditing and evaluation of these organizations.					
Poland	20	2.101	ACTIONS 39– 47: TRANSPAREN CY AND OPENNESS, <i>Phase 3</i>	The regulatory body and the operating organization should inform the general public and members of the public who may be potentially affected about the possible radiation risks arising from operational states and accidents including events with a very low probability of occurrence but with high consequences that are associated with the operation	Clarification of the group of stakeholders whom the regulatory body shall provide respective information			Yes	The para refers to the above actions in phase 3 and addresses transparency and oppeness to the public in general not to specific groups

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				of a facility.					
Poland	21	2.102	ACTIONS 39– 47: TRANSPAREN CY AND OPENNESS, <i>Phase 3</i>	The operating organization should explain to the public the technology that is deployed in its nuclear power plants and the expected environmental impacts. This could be done in a permanent public centre near the nuclear power plant and occasionally in other locations. The operating organization should also inform the news media on the progress of construction activities DELETED: including	It is unclear what is meant as "problems of general interest". Relevant contracts may contain provisions limiting disclosure of information related to obstacles or problems during construction.			Yes	The para reafirms the need to ensure tranparency also during construction. Information can be provided respecting confidentiality of comercial and security aspects.

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
				possible problems of general interest.					
Poland	22	2.114	ACTIONS 48– 60: FUNDING AND FINANCING, Phase 3	By the end of Phase 3, the operating organization should establish rates for electricity generated. The rate fixed should be set to provide funding for the sustainable safe operation of the nuclear power plant. DELETED: as allowed by the national tariff structure	The rates for electricity generated may not be necessarily established by means of national tariff structure – it is related to the model of electricity market.		Yes		changed to due consideration

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Poland	23	2.130	ACTIONS 61– 71: EXTERNAL SUPPORT ORGANIZATI ONS AND CONTRACTO RS, General	Any support obtained by the regulatory body or the operating organization will not relieve them of their responsibilities. The regulatory body and the operating organization should have adequate core competence to make informed decisions. This requires that there are an adequate number of personnel having the knowledge and experience necessary to supervise and to evaluate the work of contractors. Adequate contractual arrangements should be made to specify the roles	Grammatical correction		Yes		delete: there are

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				and responsibilities of external support organizations. DELETED: an					
Poland	24	2.154/pg 61	ACTIONS 72– 84: LEADERSHIP AND MANAGEME NT FOR SAFETY, <i>General</i>	The operating organization retains responsibility for safety when contracting any processes and receiving any item, product or service. Effective arrangements should be put in place with suppliers to specify, monitor and control the supply of items, products and services that may affect safety. Use of tailored IT tools facilitate performance of	IT tools need to be develop to facilitate all kind of data management. The amount of processes, items, products and services requires the use of tailored IT tools.			Yes	Reference only to IT tools is not necessary because there many other tools.

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				actions.					
Poland	25	2.214	ACTIONS 105–116: RADIATION PROTECTION , Phase 3	The radiation protection programme established by the operating organization should include arrangements for the control of contamination and for the monitoring of radiation levels inside the facility, releases of radioactive effluents, and doses from occupational exposure. The objective of the radiation protection programme is to protect people individually and collectively, by	Ensuring consistency with terminology used in revised safety standards.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				ensuring that doses to individuals remain within the relevant dose limits and as low as reasonably achievable. Due consideration should also be given to the appropriate design and location of structures, systems and components as prerequisites for proper radiation protection, and to the accuracy and reliability of the measuring equipment used for radiation monitoring. DELETED: radiation doses					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Poland	26	2.115	ACTIONS 48– 60: FUNDING AND FINANCING, <i>Phase 3</i>	Funding for decommissioning and for the disposal of radioactive waste and spent fuel as necessary is established as per requirements in the legislation or regulations. Provision should be made to ensure that these funds are not depleted by unauthorized use or by monetary inflation. DELETED: In the early stage of oepration, adequate funds hsould be scured until the full amount has beenr raised	As the last sentence is unclear, we suggest to delete it.			Yes	It remains as approved in the original version and is not in the scope of the review

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Poland	27	2.124	ACTIONS 61– 71: EXTERNAL SUPPORT ORGANIZATI ONS AND CONTRACTO RS, General	Independent standing bodies or temporary advisory bodies, with membership drawn from other national institutions, regulatory bodies of other States, scientific organizations and the nuclear industry, may be established to provide broad based independent advice to the regulatory body over the long termon all issues relevant to the regulatory decision making process. They could also support the development of regulations. Moreover, they could bring broad perspectives to bear	It is unclear why advisory bodies should have a right to confirm decisions of the regulatory body and what advisory bodies are meant in this point.			Yes	Advisory bodies are included in para 2.118 to provide support therefore confirming and advising the RB is not an expression of right but rather the assistance they may provide to the RB

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				on the formulation of regulatory policy and regulations. Members of advisory bodies should be independent, highly experienced, and respected by their peers in their respective fields. DELETED: Advisory bodies would confirm and advise that the regulatory body has properly addressed releavnat safety issues in licensing reviews.					
Poland	28	Action 74	ACTIONS 72– 84: LEADERSHIP AND MANAGEME NT FOR SAFETY, Phase 1	The government, when identifying senior managers for the prospective governmental organizations to be established, should look for persons with leadership capabilities and an attitude	We suggest to add that the competences of the government should be limited to governmental organizations.			Yes	The general formulation may be more appropriate for some countries.

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				emphasizing safety					
Poland	29	2.190	ACTIONS 85– 98: HUMAN RESOURCES DEVELOPME NT, Phase 3	For the purpose of providing highly skilled experts for the operating organization, the regulatory body and other organizations with crucial safety related tasks, educational institutions should continue to offer curriculums that are appropriate to meeting the needs of the nuclear power programm, including safety culture. DELETED: er			Yes		deleted {r}

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Poland	30	2.219	ACTIONS 117–121: SAFETY ASSESSMENT , General	Safety assessment should be a systematic process throughout the lifetime of the plant to identify radiation risks that arise for workers, the public and the environment during normal operation, in anticipated operational occurrences, and in accident conditions (including severe accidents conditions with a very low probability of occurrence). The aim of safety assessment is to determine whether adequate measures have been taken to control radiation risks to an acceptable level, with account taken	Ensuring consistency with the terminology used in the document reflecting the terminology applied in revised safety standards.	Yes			
Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
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				prevention of abnormal events and the mitigation of their consequences. The scope and level of detail of the safety assessment should increase as the design develops and as the way in which the plant will be operated is defined. Requirements for carrying out a safety assessment are established in Ref. [41].					
Poland	31	2.222	ACTIONS 117–121: SAFETY ASSESSMENT , General	The safety assessment should cover all the scientific and technical issues that relate to the safety of the plant and the associated radiation risks. This includes the safety analysis, which consists of a set of different	Ensuring consistency with the terminology used in the document reflecting the terminology applied in revised safety standards.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				analyses for evaluating and assessing challenges to safety in various plant states, including anticipated operational occurrences and accident conditions (including severe accident conditions with a very low probability of occurrence). The safety assessment uses both deterministic and probabilistic methods.					
Poland	32	2.263	ACTIONS 133–145: EMERGENCY PREPAREDNE SS AND RESPONSE, Phase 2	Emergency response plans, procedures and concepts of operations;	Ensuring consistency with the terminology used in the document reflecting the terminology applied in revised safety standards.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Poland	33	2.265	ACTIONS 133–145: EMERGENCY PREPAREDNE SS AND RESPONSE, Phase 2	The establishment of an emergency response organization and of the associated interactions and provisions should be commenced in Phase 2 as it can take a long time.	Ensuring consistency with the terminology used in the document reflecting the terminology applied in revised safety standards	Yes			
Poland	34	Action 143	ACTIONS 133–145: EMERGENCY PREPAREDNE SS AND RESPONSE, Phase 3	The government and the regulatory body should establish arrangements for coordination between the emergency response plan of the nuclear power plant and the plans of the relevant national institutions that would be involved in emergency response.	Ensuring consistency with the terminology used in the document reflecting the terminology applied in revised safety standards.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Poland	35	2.269	ACTIONS 133–145: EMERGENCY PREPAREDNE SS AND RESPONSE, Phase 3	Programmes, plans and procedures for preparedness for a nuclear or radiological emergency should be implemented at the international, national, regional , local and operating organization levels. Emergency notification systems should be in place and should be thoroughly tested. The State should be responsible for establishing arrangements for coordination between the emergency response plan of the nuclear power plant, the plans of the relevant national institutions involved in emergency	Ensuring consistency with the terminology used in the document reflecting the terminology applied in revised safety standards.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Poland	36	2.271	ACTIONS 133–145: EMERGENCY PREPAREDNE SS AND RESPONSE, Phase 3	response at all levels, and other States, consistent with the relevant IAEA safety standards [26] and conventions [Early Notification, Assistance, Nuclear Safety Conventions and Joint Convention] At this stage, the regulatory body should have reviewed and, if required, approved the on-site emergency response plans and the government through the coordination mechanisms should have reviewed and approved, as necessary, respective emergency response plans at	Ensuring consistency with the terminology used in the document reflecting the terminology applied in revised safety standards	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				local, regional and national levels. The government through the coordination mechanism and the regulatory body should also have verified the adequacy and consistency of these plans in emergency drills and exercises conducted with the participation of local and national organizations, and, if appropriate, organizations in other States and international organizations involved in response in all phases of an					
				emergency.					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Poland	37	3.96	189–192:	and exercises. Since	Grammatical correction. Ensuring consistency with the terminology used in	Yes			
			TRANSPORT	the quantity of	the document reflecting the terminology				
			SAFETY,	radioactive material	applied in revised safety standards.				
			Phase 1	being transported					
				will increase					
				considerably, there					
				should be effective					
				response 1 In to this					
				noint the					
				radioactive material					
				being transported is					
				most likely to pose a					
				secondary risk in					
				any serious					
				transport accident.					
				However, with the					
				development of a					
				nuclear power					
				programme, there					
				may be cases in					
				radioactive material					
				could give rise to					
				the primary risk in					
				an accident. This					
				could have wide					
				ranging					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				implications, depending on the national infrastructure and arrangements for an emergency preparedness and response.					
Spain									
Spain	1	Para. 2.12	ACTIONS 1– 10: NATIONAL POLICY AND STRATEGY FOR SAFETY; Phase 1	At the end of the list of elements that the government should also take into account, introduce the following: - "Other considerations outside the nuclear safety regime, such as the need of having a nuclear third party liability regime (consideration of participation at international	This is a list of elements to be considered, not only restricted to the safety regime. A comprehensive view on the other aspects besides safety is beneficial (3-S approach plus liability).			Yes	out of scope

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				nuclear liability conventions) or other instruments in the area of nuclear security and safeguards (i.e. application of relevant safeguards agreements)".					
Spain	2	Para. 2.106 Action 51	ACTIONS 48– 60: FUNDING AND FINANCING; Phase 1	Before announcing action 51, add: "At the initial stages of development of the nuclear power programme, overriding principles in radioactive waste management should be taken into account, in particular the need of avoiding imposing undue burdens to future generations –inter alia financial burdens Other principles may be considered such as the polluter pays	Action 51 should be supported by a WHY, explaining the fundamental reasons why the decommissioning funds should be set. Two principles serve as basis: avoiding undue burdens in the sense of financial burdens, and polluter pays. The protection of future generations in a broader sense is a fundamental principle for safety (FS-1) and figures inter alia as one of the objectives of the Joint Convention.		Yes		edited to be consistent to the safety fundamentals

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				principle"					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Spain	3	Para. 2.151.	ACTIONS 61– 71: EXTERNAL SUPPORT ORGANIZATI ONS AND CONTRACTO RS; <i>Phase 3</i>	Change "may" by "must" in the following sentence: "However, depending on the system in the State, the regulatory body, or some other national certifying body MUST establish certification requirements for the providers of technical services that have implications on safety".	The approach preferred in a given State (hereinafter "the installation State") for developing a nuclear programme can be based on turn-key projects and other kind of projects where a foreign vendor applies technologies based on standards which are new and not yet well known by the installation State. In such circumstances, the installation State cannot accept that the knowledge and the capacity of regulating these facilities and activities are kept in the hands of the vendor or contractor; neither should it be sufficient to assert that such facilities or activities are conform with the standards accepted by the regulatory body of the vendor's State of origin. The regulatory body of the installation State is the one who must judge on the adequacy of those standards, or take measures to strengthen them, therefore developing an own set of standards. From our point of view this is an obligation which is inherent to the function of regulating.		Yes		Safety guides do not use MUST. This para deals with the practice of certification. Ensuring the quality of service providers is addressed in actions 67 and 71 . NO NEW TEXT REQUIRED

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Spain	4	2.161.	ACTIONS 72– 84: LEADERSHIP AND MANAGEME NT FOR SAFETY; <i>Phase 1</i>	Proposal to add: "- besides, this would compromise the concept of independence of the regulatory body as explained in paragraph 2.65 et al".	To the following sentence of this paragraph: "Organizations headed by persons who are perceived as lacking competence or as holding their positions for political reasons will have difficulty in maintaining confidence internally and externally": it would be beneficial to bring this in relation with the concept of independence of the regulatory body in a broader sense, the way it is described in paragraph 2.65 and others of this document.	Yes			
Spain	5	para. 2.198	ACTIONS 99– 104: RESEARCH FOR SAFETY AND REGULATORY PURPOSES; Phase 1	Consider a new Action 104: "The State will coordinate the initiatives of the different research centers in a national strategy for research"	Action 103 acknowledges the role of the different research centers. It is important to coordinate the efforts of these centers seeking for optimization and efficiency. In the next paragraph (2.199) reference is made to "an integrated research plan" to be developed (presumably by the operating organization and the regulatory body), but it is not clear whether this integrated plan corresponds to the notion of "national strategy for research". National strategy implies that this coordination is led by the Government or relevant organ of the State.		Yes		COMMENT INCLUDED IN 2.199

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Spain	6	para. 2.242	ACTIONS 122–132: SAFETY OF RADIOACTIV E WASTE MANAGEME NT, SPENT FUEL MANAGEME NT AND DECOMMISSI ONING; <i>General</i>	Add after the paragraph: "Irrespective of the State's decision as to the establishment of a dedicated waste management organisation, the responsibility of the license holder must be clearly defined. This implies that it must be made clear in which steps the responsibility corresponds to the waste generator and when this responsibility is transferred to the waste management organization".	Importance of clear assignment of responsibilities; reflection of the principle of prime responsibility for safety for the license holder.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Spain	7	Action 122 by para. 2.244	ACTIONS 122–132: SAFETY OF RADIOACTIV E WASTE MANAGEME NT, SPENT FUEL MANAGEME NT AND DECOMMISSI ONING; Phase 1	Add at the end of the action: "The State shall define that the waste generator has primary responsibility over the waste until the transfer of responsibility takes place; and who has ultimate responsibility over it".	Quoting IAEA GS-G-3.3: "Under the 'polluter pays' principle, the organization that generates the waste is responsible for ensuring that the waste is managed properly. In some jurisdictions, ownership (and hence ultimate responsibility) for waste is transferred when the waste changes hands. In other jurisdictions, waste always remains the responsibility of the original generator. Care should be taken to keep the responsibility clear and fulfilled at all times." Note that, in respect of the transfer of responsibilities in the context of the preparation for commissioning after construction, an Action has been introduced in the same sense as the one that proposed (action 187: "The operating organization should establish mechanisms for the transfer of responsibilities for safety with the constructor at the end of Phase 3")			Yes	The transfer of responsibility is addressed in phase 3. The legal basis varies among countries.
Spain	8	Action 123 by para. 2.245	ACTIONS 122–132: SAFETY OF RADIOACTIV E WASTE MANAGEME NT, SPENT FUEL	Add word "policy": "The government should consider the feasible options for radioactive waste management (including disposal of waste), spent fuel	Different meanings of policy and strategy as explained in IAEA guide "Policies and Strategies for Radioactive Waste Management" (NW-G-1.1)	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
			MANAGEME NT AND DECOMMISSI ONING; Phase 1	management and decommissioning, on the basis of a comprehensive long term POLICY AND strategy".					
Spain	9	Action 124 by para. 2.247	ACTIONS 122–132: SAFETY OF RADIOACTIV E WASTE MANAGEME NT, SPENT FUEL MANAGEME NT AND DECOMMISSI ONING; Phase 2	Add word "policy": "The government and other interested parties as appropriate should establish the national POLICY AND strategy for radioactive waste management", etc.	Same reasoning as above	Yes			
Spain	10	Action 128 by para. 2.251	ACTIONS 122–132: SAFETY OF RADIOACTIV E WASTE MANAGEME NT, SPENT FUEL MANAGEME NT AND DECOMMISSI	Add word "policy": "The operating organization should prepare a programme for radioactive waste management and spent fuel management, as well as a decommissioning	Same reasoning as above	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
			ONING; Phase 3	management programme, in accordance with the national POLICY AND strategy", etc.					
Spain	11	Para. 2.254	ACTIONS 122–132: SAFETY OF RADIOACTIV E WASTE MANAGEME NT, SPENT FUEL MANAGEME NT AND DECOMMISSI ONING; Phase 3	Add at the end of this paragraph: "The State can consider introducing the polluter-pays principle in that legislation"	(self-explanatory)			yes	Not in IAEA SS
Spain	12	Para. 2.244 and ff	ACTIONS 122–132: SAFETY OF RADIOACTIV E WASTE MANAGEME NT, SPENT FUEL MANAGEME NT AND DECOMMISSI	General comment: in the waste chapter, we miss a reference to the public information and participation, in particular in the site selection procedures			TO BE DISCU SSED		

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
			ONING; General						
Spain	13	Para. 2.262	ACTIONS 133–145: EMERGENCY PREPAREDNE SS AND RESPONSE; Phase 1	Add at the beginning of this paragraph: "The international cooperation plays a key role in emergency preparedness and response"	In the precedent paragraphs, the provisions are about coordination of national bodies (ie local authorities and national organizations). It would be beneficial to stress also the importance of international cooperation, which in the text is only referred to the convenience of adhering the two international Conventions.	Yes			
Spain	14	Para. 3.14.	ACTIONS 146–159: OPERATING ORGANIZATI ON; <i>Phase 2</i>	Introduce the following words: "It is recognized that in some States the operating organization may not be the eventual legal owner of the nuclear power plant. Where this is the case, the clarity of the roles and responsibilities of each organization should be ensured. THE KEY IS THE	In our opinion, the added sentence helps to clarify reflecting <u>in practical terms</u> the principle of prime responsibility for safety. The assignment of responsibilities may seem too abstract when the reference is the owner of the plant (sometimes different owners may be at stake); but the license holder is commonly easier to identify.			Yes	maty cause confusion

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				ANSWER TO THE QUESTION: "WHO IS THE HOLDER OF THE LICENSE?" However, Tthe prime responsibility for safety rests with the authorized party that becomes the operating organization of the nuclear power plant."					
Spain	15	Para. 3.31	ACTIONS 160–169: SITE SURVEY AND SITE EVALUATION ; Phase 1	Sentence "The public should be engaged at these early stages". This sentence is insufficient; this content needs to be developed.	More emphasis is needed on the due regard to the public information and participation, for example in the designation of a site.		Yes		Public engagemnt is stressed throughout the whole guideline
Spain	16	Para. 3.83	ACTIONS 185–-188: PREPARATIO N FOR COMMISSIO NING; Phase 3	"The operating organization should establish mechanisms to transfer the ownership of the plant systems from the vendor". Add the words: "Again,	Same consideration as above for comment 14. The ownership regime can lead to confusion as it can be different in different States; but determinant here is the assignment of responsibility based on the license holder.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				the key aspect lies on who is the holder of the license".					
United Kingdom									
United Kingdom	1	2.12	ACTIONS 1– 10: NATIONAL POLICY AND STRATEGY FOR SAFETY, <i>Phase 1</i>	Para. 2.12 states. "The government should al-so take into account:The need for and provision for spent fuel management and radioactive waste manage- ment, including disposal of radioactive waste (see also paras 2.236-2.252 COMMENTS 1) The State should have the infrastructure for waste management at the same time as the NPP. 2) Suggest inclusion				Yes	comment 1 addressed in 2.12 sixth bullet and comment 2 because the para deals with government considerations and design for decommissioning is generally more an issue for the utility and regulatory body

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				of "De-sign for Decommissioning" in list of matters to be taken into account.					
USA									
USA	1	General		The Table of Contents is misaligned with the text for the page numbering of titles/subtitles. Please revise to avoid confusion.		YES to be done			
USA	2	General		The scope of DS486 involves Phases 1 through 3 only. Figure 1 shows safety infrastructure development over the life cycle of the nuclear power plant that needs to be	Completeness to address safety infrastructure aspects overlap with phases 4 and 5. The guidance should provide references of guidance documents, or briefly summarize aspects of safety infrastructure for Phases 4 and 5, to ensure continuity and minimize redundancies.			Yes	In para 1.6 reference is made to the origin of Fig 1 and explains that this safety guide deals only with phases 1-3.

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Acceptea, but modified	Rejected	Reason for modification/ rejection
				established for the five phases of NPP development including operation phase as well as decommissioning phase. Throughout the guidance document including the Appendix; there is no reference or mention of overlapping safety infrastructures with Phases 4 and 5. We recommend adding paragraphs or texts explaining such anticipated overlap of safety infrastructures.					
USA	3	Page 14, Figure 5	Structure	Under item 11, column 2, modify to read: "Radiation Safety and Environmental Protection."	Need to cover environmental protection and monitoring since GSR Part 3 covers both areas (e.g., effluent releases to the environment).		Yes		The chapter deals also with environmental protection but title has been agreed in the original version of this SS

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
USA	4	Page 14, Figure 5	Structure	Under Item 13, Column 3, add:"SSR- 5 and GSG-1."	Safety requirements for radioactive waste disposal under SSR-5 and waste classification scheme under GSG-1 should also be included to develop adequate programs for predisposal management and program for treatment, storage, or developing routes for waste disposal.		Yes		The column refers only to requirements
USA	5	Page 16 2.6	ACTIONS 1– 10: NATIONAL POLICY AND STRATEGY FOR SAFETY, <i>General</i>	in order to identify and to make those safety improvements that are considered practicable needed to ensure continued safe operation of the facility. Implementation may require	"Practicable" is not the proper threshold.		Yes		
USA	6	Page 20 2.14	ACTIONS 1– 10: NATIONAL POLICY AND STRATEGY FOR SAFETY, Phase 1	The referenced paragraphs in the fourth line should be revised to 2.204- 2.216 for accuracy with the document.	accuracy	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
	/	2.15	10:	knowledgeable	monitoring are essential elements of the		103		comment fro Germany
			NATIONAL	decision regarding	safety infrastructure to fulfill SF-1				and action 106
			POLICY AND	the introduction of	objectives and SF-1 Principle 7.				
			STRATEGY	a nuclear power					
			FOR SAFETY,	programme, the					
			Phase 1	government should					
				ensure that the					
				environmental					
				impact is thoroughly					
				understood, and					
				that an adequate					
				assessment of the					
				State's safety					
				infrastructure and					
				needs has been					
				conducted. <u>The</u>					
				government should					
				ensure that an					
				<u>effective</u>					
				environmental					
				monitoring					
				program, with					
				associated					
				infrastructure is					
				nlanned At the end					
				of Phase 1 the					
				government should					

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				be fully aware					
USA	8	Page 30 2.41 (1)	ACTIONS 20– 23: LEGAL FRAMEWOR K, Phase 1	The reference to "Radiation Protection" in item 1 of the list should be revised to 2.204- 2.216 for accuracy with the document.	accuracy	Yes			
USA	9	Page 51, Para 2.113	ACTIONS 48– 60: FUNDING AND FINANCING, Phase 2	Modify Para 2.113 to read: 2.113 Financial assurance mechanism and plans for allocation of decommissioning funds and waste management should be in place before granting a license to operate. In addition, the mechanism, timing, and plans for	Completeness to address having a financial assurance mechanism and plans to cover potential costs of decommissioning and waste and spent fuel management.	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
				funding for the long term management and disposal of radioactive waste, decommissioning and the management of spent fuel should be reviewed periodically to ensure availability of necessary funds and take into account the fact that the plant might be forced to stop operation before the end of its design					
USA	10	Page 56 2.136	ACTIONS 61– 71: EXTERNAL SUPPORT ORGANIZATI ONS AND CONTRACTO RS, Phase 1	Line 3. "and could decide to build and develop local industrial, educational, and research organizations."	Planning for these organizations should start in phase 1				

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
USA	11	Page 94 2.261	ACTIONS 133–145: EMERGENCY PREPAREDNE SS AND RESPONSE, Phase 1	An appreciation of the need for emergency planning should be developed with involvement of <u>the</u> whole community, <u>including</u> local authorities and national organizations.	Based on lessons learned from the 9/11 attacks and hurricane Katrina in 2005, the US now involves the whole community of emergency organizations, including the private sector and faith based organizations.	Yes			
USA	12	Page 95 2.263	ACTIONS 133–145: EMERGENCY PREPAREDNE SS AND RESPONSE, Phase 2	Include a bullet for "Procedures for classification of emergency conditions".	The concept of emergency classification is so important that it should not be folded in under a generic step requiring emergency response plans, procedures and concept of operations.	Yes			
USA	13	Page 95 2.263	ACTIONS 133–145: EMERGENCY PREPAREDNE SS AND RESPONSE, Phase 2	Insert new 8th bullet: Procedures for requesting and effectively using assistance resources from other identified organizations capable of augmenting the planned response.	An emergency response programme should identify those resources and assistance that may need to be requested.	Yes			

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USA	14	Page 96 Action 145	ACTIONS 133–145: EMERGENCY PREPAREDNE SS AND RESPONSE, Phase 3	The government, the regulatory bodyby conducting appropriate exercises that include <u>the whole</u> <u>community</u> local authorities and local communities.	Based on lessons learned from the 9/11 attacks and hurricane Katrina in 2005, the US now involves the whole community of emergency organizations, including the private sector and faith based organizations.			Yes	USA comment 11 was accepted
USA	15	Page 107 (see 113)		The reference in the two "Radiation Protection" bullets should be revised to 2.204-2.216 for accuracy with the document.	accuracy	Yes			
USA	16	Page 112 Para. 3.37		The referenced paragraphs in the last line should be revised to 2.204- 2.216.	accuracy	Yes			
USA	17	Page 120 Para. 3.52		The referenced paragraphs in the last line should be revised to 2.204- 2.216.	accuracy	Yes			
Pakistan	1	1.5/4		This publication covers	Unnecessary use of Reference (5)			Yes	More clear as is

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Pakistan	2	1.6/7-2	The lifetime of a nuclear power plant into five phases (shown in figure 1)	The correct usage refers to Fig.1 very late in the text; it gives the impression that Fig. 1 is suitable only for phase 5		Yes			
Pakistan	3	2.222/2nd bullet point	ACTIONS 117–121: SAFETY ASSESSMENT	PSA, like deterministic analysis, uses conservative assumptions to evaluate contributing factors				Yes	The existing text is clear
Egypt	1	Page 5, para 1.8 line 4		It is expected that the organizations or persons using this safety <u>requirements</u>	The word requirements should replace guides at the beginning of line number 5			Yes	It refers to SSG 16 safety guide
Egypt	2	Para 2.2 page 15		The national strategy for emberking on a nuclear power programme needs to recognize the possibility of nuclear emergency and the strategy of spent fuel storage	and the strategy of spent fuel storage is added here or at the end of para 2.2			Yes	this para. Deals only with nuclear emergency . Strategy of spent fule is addressed in other chpt.

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Egypt	3	Para 2.11 line 4		to appoint a project organization leader				Yes	The intention of the para is the establishment of an organization with a governmental mandate
Egypt	4	Action 5 page 20		The regulatory body should establish a clear national policy and strategy for meeting safety requirements	Meeting safety requirements is the direct task of the regulatory body and according to Fig. 3 RB is established at the end of phase 1 or beginning of phase 2			Yes	It follows action 1. Indeed the enforcement of the policy is with the RB
Egypt	5	Para 2.18 page 21		Coordination mechanisms among all organizations responsible for nuclear power programme put in place are efficient and effective and should improve them as necessary	To clear the meaning insert " among all organizations responsible for the nuclear power programme"	Yes			
Egypt	6	Para 2.84 page 43		The style of line 10 1nd 11 of para 2.84 should be the same style of the document		Yes			
Egypt	7	Para 2.86 page 44 line1		submitted by the operating organization and	Licence should be based on both review and assessment and regulatory inspection	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepted, but modified	Rejected	Reason for modification/ rejection
				the regulatory inspection conducted by the regulatory body					
Egypt	8	Para 2.197 page 50		The government should take into account the costs of establishing, strengthening and training of the regulatory body				Yes	This para addresses safety reseach
Egypt	9	Para 2.116 page 53		However it may not be feasible to conduct within external organizations and contractors all detailed assessment of design information and inspection results or verifications of the correctness of safety analysis	Replace these by external organizations and contractors to separate them from regulatory body and operating organizations			Yes	These refers to the RB and OO
Egypt	10	Page 71 action 95 second line		response organization	instead of responseorganization	Yes			
Egypt	11	Page 73 para 2.191		assistance and	assistance and should be in the same font of the document	Yes			

Country	No.	Para/Line No.	Ref. to SSG- 16 chapter	Proposed new text	Reason	Accepted	Accepteu, but modified	Rejected	Reason for modification/ rejection
Egypt	12	Action 104 page 76		plant site	delete the distances between plant site ant the end of action 104		Yes		the text here is right and left adjusted for publication editing later
Egypt	13	Page 85 para 2.231		paras 2.116-2.151	point should be inserted 2.151 to correct the para number	Yes			
Egypt	14	Para 269 page 93 line 7		[EPR - Embarking 2012]	More details should be given for this reference	Yes			